

EXHIBIT "B"

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

NICOLE JENNINGS WADE,  
JONATHAN D. GRUNBERG, and  
G. TAYLOR WILSON,

Plaintiffs,

v.

L. LIN WOOD,

Defendant.

Case No. 1:22-cv-1073-MLB

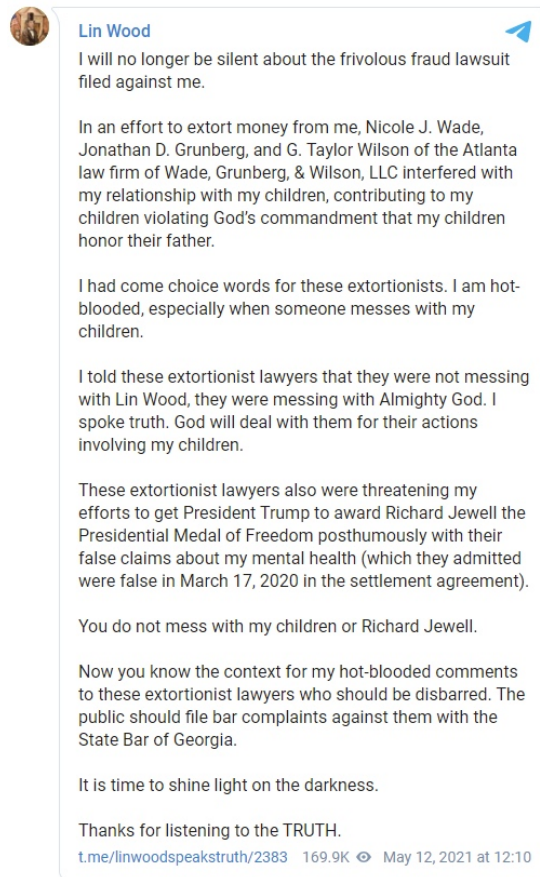
**DECLARATION OF NICOLE JENNINGS WADE**

I, Nicole Jennings Wade, declare as follows:

1. I am one of the plaintiffs in this action. I have personal knowledge of the facts set forth in this declaration, am over 18 years of age, and am otherwise competent to make this declaration.

2. I submit this declaration in support of Plaintiffs' Motion for Partial Summary Judgment.

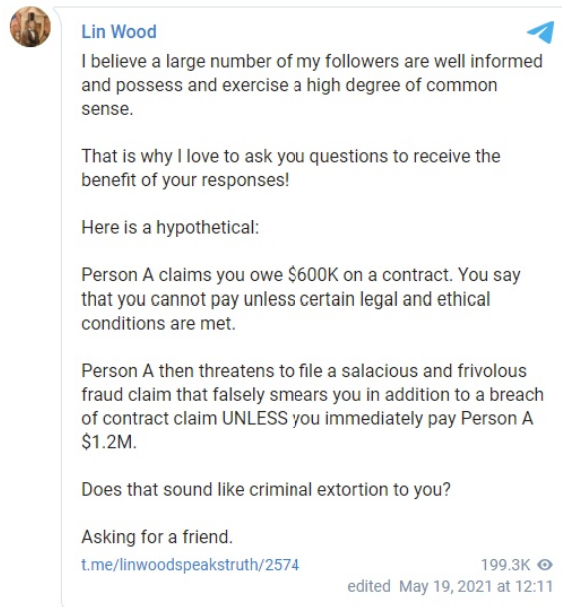
3. This is a true and correct screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 12, 2021:



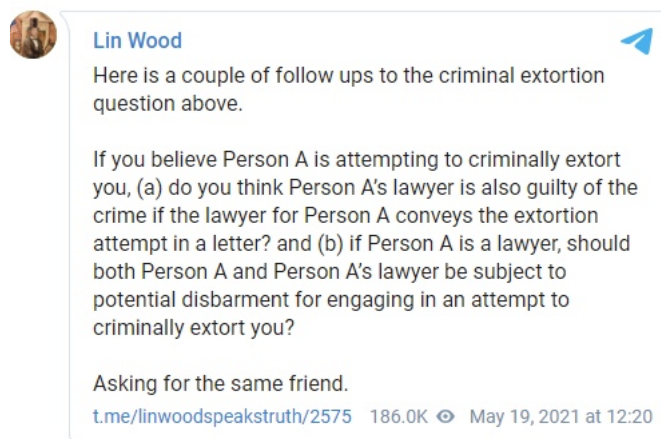
4. This is a true and correct transcription of an excerpt of a speech made by Defendant Wood that he posted in video form to his Telegram channel, Lin Wood Speaks Truth, on May 13, 2021:

I'm gonna tell you the truth about that lawsuit. These people tried to extort money out of me that they didn't have and didn't, didn't, didn't deserve. . . . So the truth of the matter is it was an extortionist type attempt by these lawyers . . .

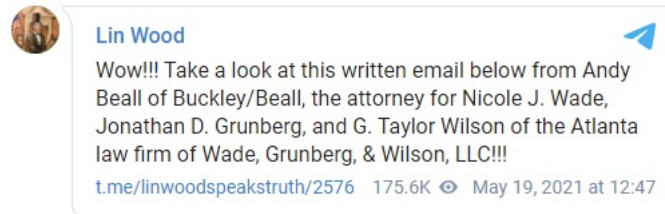
5. This is a true and correct screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 19, 2021, at 12:11 pm:



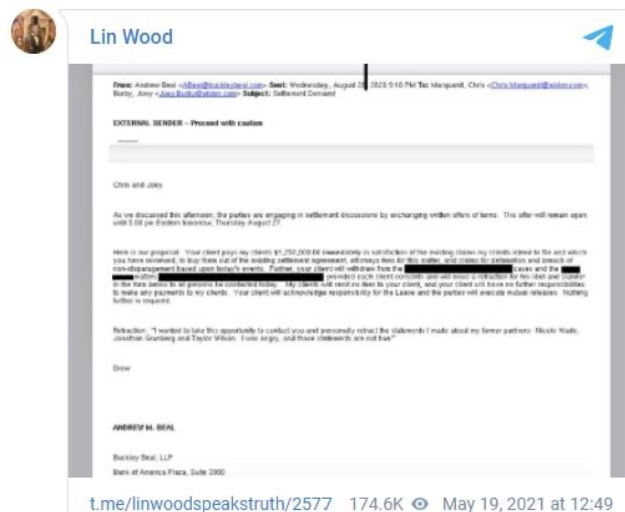
6. This is a true and correct copy of a screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 19, 2021, at 12:20 pm:



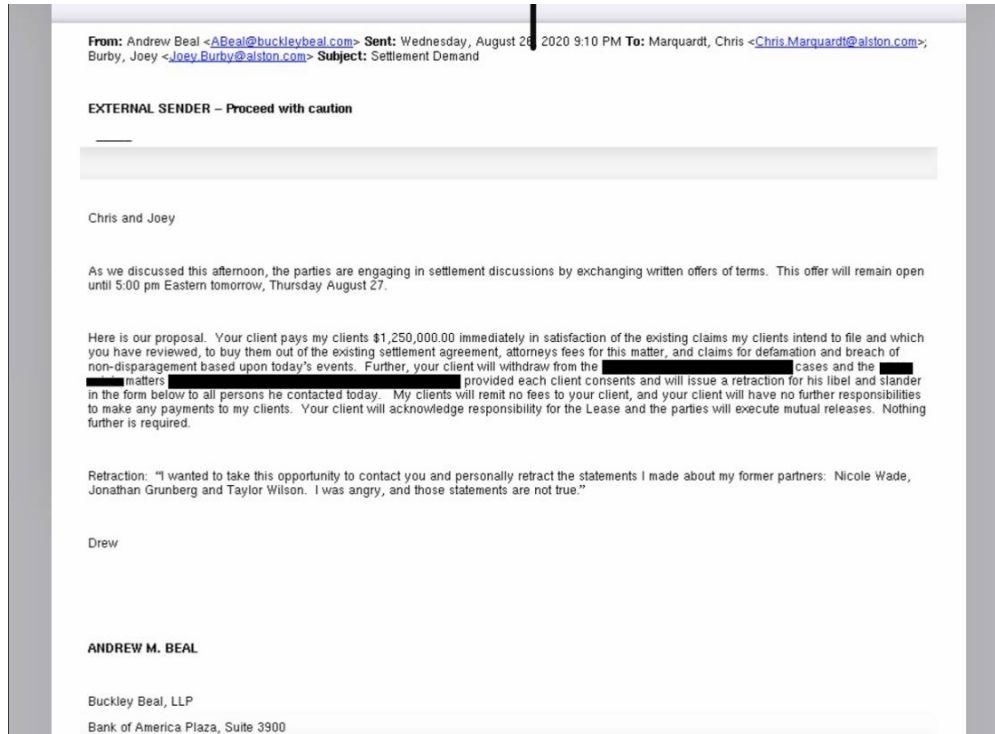
7. This is a true and correct copy of a screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 19, 2021, at 12:47 pm:



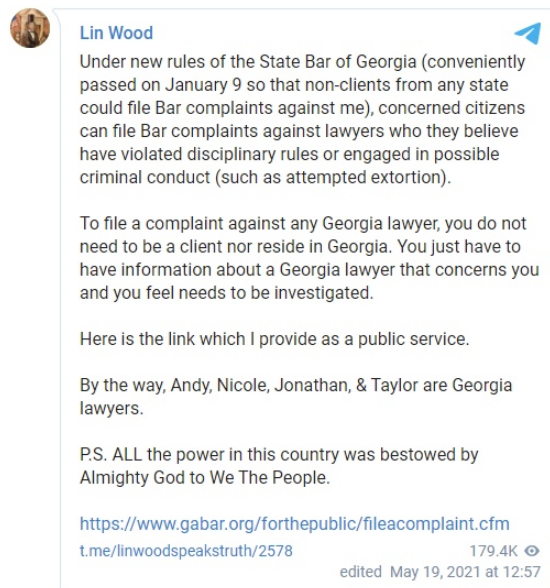
8. This is a true and correct copy of a screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 19, 2021, at 12:49 pm:



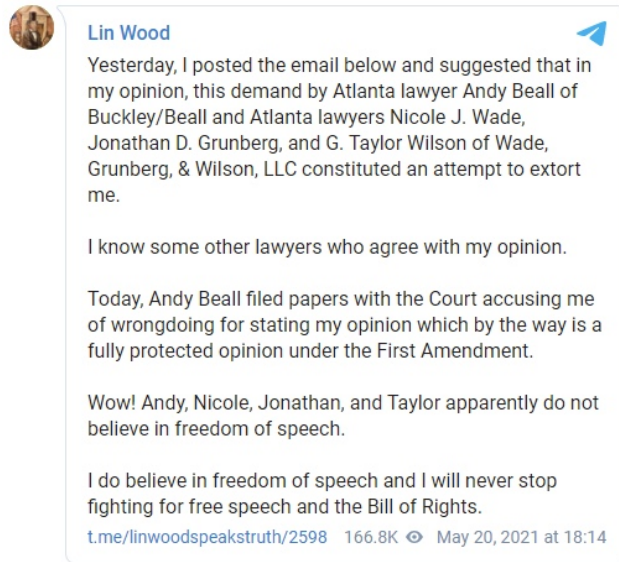
9. This is a true and correct screenshot of the image that appears when you click on the image embedded in the post shown in ¶ 8 above:



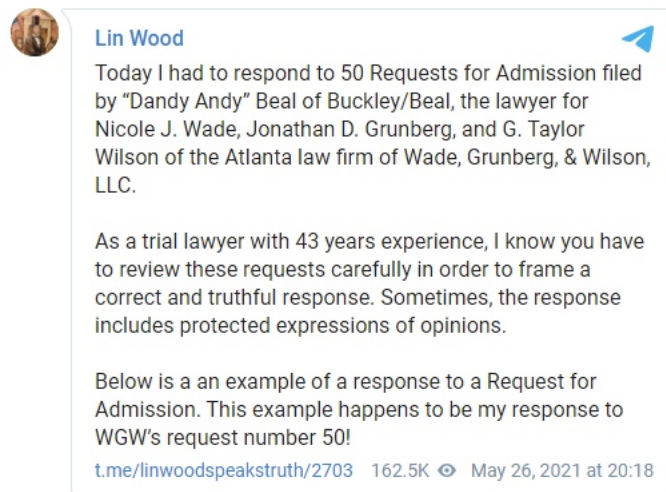
10. This is a true and correct copy of a screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 19, 2021, at 12:57 pm:



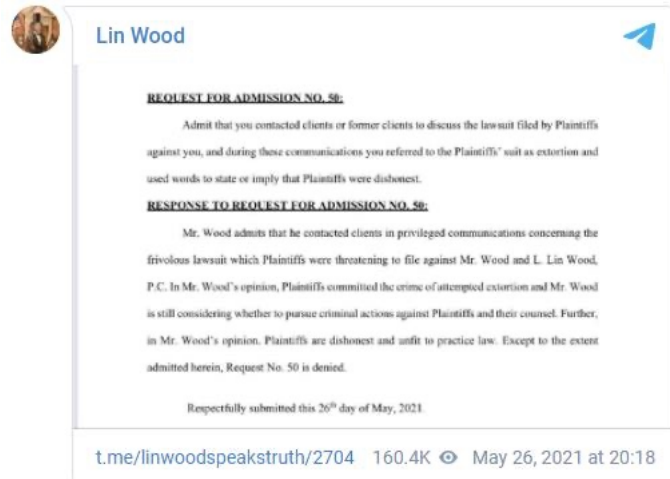
11. This is a true and correct copy of a screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 20, 2021, under which he reposted the image from ¶ 9 above:



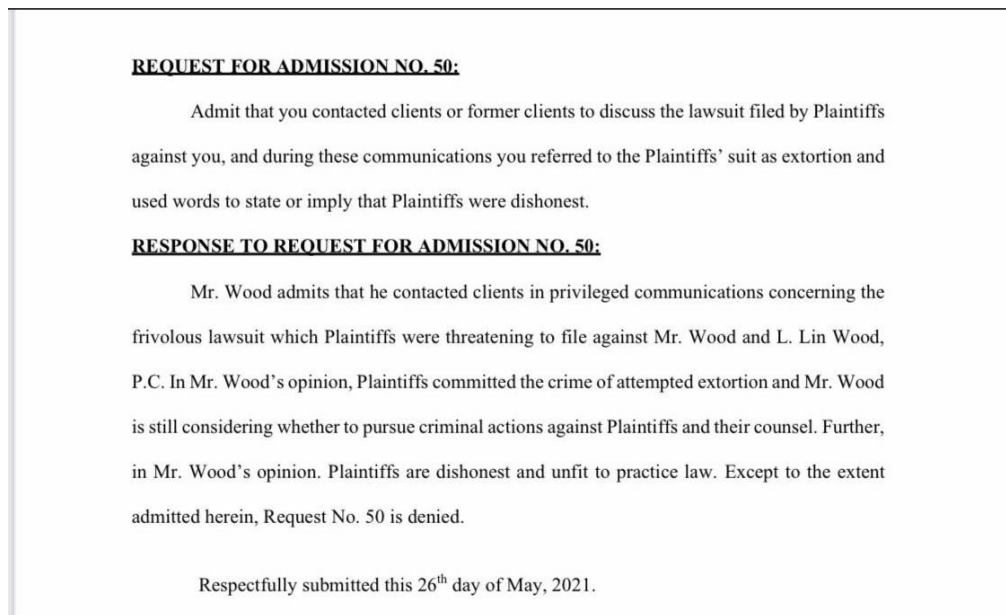
12. This is a true and correct copy of a screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 26, 2021, at 8:18 pm:



13. This is a true and correct copy of a screenshot of a post made by Defendant Wood to his Telegram channel, Lin Wood Speaks Truth, on May 26, 2021, at 8:18 pm:



14. This is a true and correct screenshot of the image that appears when you click on the image embedded in the post shown in ¶ 13 above:





15. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' First Requests for Admissions to Defendant Wood dated July 19, 2022.

16. Attached as Exhibit 2 is a true and correct copy of Defendant's Responses to Plaintiffs' First Request for Admissions dated August 31, 2022 (Dkt. 38).

17. Attached as Exhibit 3 is a true and correct copy of a transcript of a purported "deposition" of me dated June 16, 2021, that Defendant Wood posted to his Telegram channel, Lin Wood Speaks Truth, on June 16, 2021. Defendant Wood posted the transcript as well as the videotape of the proceedings.

18. Attached as Exhibit 4 is a true and correct copy of a transcript of a purported "deposition" of Taylor Wilson dated June 17, 2021, that Defendant Wood posted to his Telegram channel, Lin Wood Speaks Truth, on June 18, 2021. Defendant Wood posted the videotape of the proceedings on June 17, 2021.

19. Attached as Exhibit 5 is a true and correct copy of a transcript of a purported "deposition" of Jonathan Grunberg dated June 18, 2021, that Defendant Wood posted to his Telegram channel, Lin Wood Speaks Truth, on June 18, 2021. Defendant Wood posted the transcript as well as the videotape of the proceedings.

20. The transcripts attached as Exhibits 3, 4, and 5 are actually Videotaped Certificates of Non-Appearence of Taylor, Jonathan, and me—we did not appear



because we had previously filed a Motion for Protective Order regarding the depositions. Aside from a few brief comments from others who were present, virtually all of the colloquy on the record is from Defendant Wood. The transcript of my nonappearance is actually a rough draft instead of a final transcript.

21. Jonathan, Taylor, and I worked with Lin at L. Lin Wood, P.C. (the “Firm”) for several years prior to February 14, 2020, at which time we found it necessary to part ways with Lin and the Firm.

22. The lease for the Firm was solely in the name of the Firm—although Jonathan, Taylor, and I signed as “partners” of the Firm, there were no individual guaranties for the lease.

23. On February 14, 2020, after we advised Lin that we were leaving, he had building security escort us out of the office at 5:00 pm and then had the building change the locks.

24. On February 17, 2020, Jonathan, Taylor and I had a phone call with Lin during which we reached agreements on how to divide ongoing client responsibilities and also on the distributions that we would receive from the Firm’s contingency fee in cases that had already settled prior to our departure from the Firm but that had not yet been funded. The agreement is confirmed in an email, which is Exhibit 6 to Lin’s deposition and attached to our Brief at Exhibit A, tab 6.

25. Both sides engaged lawyers, and on Friday, March 13, 2020, at 4:40 pm, Lin's lawyers emailed us an offer with a draft term sheet, advising us that it was non-negotiable and that the offer would expire the following day (Saturday) at 5 pm. This is a true and correct screenshot of the email from Lin's lawyer:

From: "Marquardt, Chris" <[Chris.Marquardt@alston.com](mailto:Chris.Marquardt@alston.com)>  
Date: March 13, 2020 at 3:40:18 PM CDT  
To: Andrew Beal <[ABeal@buckleybeal.com](mailto:ABeal@buckleybeal.com)>  
Cc: "Burby, Joey" <[Joey.Burby@alston.com](mailto:Joey.Burby@alston.com)>  
Subject: Confidential Settlement Communication

Drew:

Thanks for getting on the phone with me last evening, and for following up with a revised settlement proposal from your clients. I'm pleased to see the productive movement from both sides, and I hope that we are now at the point to cut a final deal.

To that end, attached is a final settlement term sheet. It has been approved by our client. Lin has instructed us to make clear that this is a non-negotiable, last-and-final settlement offer. You and I have both been doing this for a long time. I note, for what it's worth, that I do not agree to characterize an offer in that way unless it is 100% certain that my client will not negotiate any additional terms. That is where we are in this dispute.

Lin also instructed us to make clear that this offer will expire at 5pm tomorrow (Saturday March 14<sup>th</sup>) if not accepted by your clients by that time. To accept the offer, please have each of your clients sign on the spaces at the bottom of the term sheet. If we have a deal, Joey and I will prepare a formal settlement agreement draft for your review, to be signed by the parties no later than close of business on Wednesday March 18<sup>th</sup>.

We believe that this is a very fair and reasonable resolution of the clients' various issues. We hope your clients view it the same way. Lin asked me to mention again that he truly does want each of your clients to be successful, and that once this agreement is signed and the parties move forward he fully intends to keep them high on his list for referrals of future matters.

I look forward to hearing back from you soon. Thanks.

Christopher C. Marquardt  
Alston & Bird LLP  
1201 West Peachtree Street  
Atlanta GA 30309-3424  
(404) 881-7827 direct  
(404) 253-8741 e-fax  
[chris.marquardt@alston.com](mailto:chris.marquardt@alston.com)

We agreed and executed the term sheet the next day after a few edits.

26. On March 17, 2020, Lin's lawyers emailed us a draft settlement agreement, to be signed that day, and told us that we would be able to access the office once it was executed. (Lin had prevented us from accessing the office after we were locked out on February 14—despite claiming that he told the building to let us in—and we had been unable to retrieve our client files, personal belongings, or furniture despite numerous requests to Lin, to his lawyers, and to the building.) This is a true and correct copy of the email from Lin's lawyer:

**From:** "Marquardt, Chris" <Chris.Marquardt@alston.com>  
**Date:** March 17, 2020 at 12:37:38 PM EDT  
**To:** Andrew Beal <ABeal@buckleybeal.com>  
**Cc:** "Burby, Joey" <Joey.Burby@alston.com>  
**Subject:** Wood Settlement Agreement (AB draft 3-17-2020)

Drew:

Attached is our draft of the settlement agreement. I know you're in and out of sessions at mediation, and will be flipping this to your clients. This agreement has been discussed at length with our client, and he is ready to sign this afternoon once your clients sign. Once signed, they can get access to the office space for move-out, and Joey will be there to facilitate. I'll call again in a moment to discuss. Thanks.

Christopher C. Marquardt  
Alston & Bird LLP  
1201 West Peachtree Street  
Atlanta GA 30309-3424  
(404) 881-7827 direct  
(404) 253-8741 e-fax  
chris.marquardt@alston.com

After exchanging a few edits, Jonathan, Taylor, and I executed the settlement agreement, which resolved all outstanding issues between the parties, that same day. That agreement is Exhibit 12 to Lin's deposition and is attached to our Brief at Exhibit A, tab 12.

27. In addition to including the same fee distributions that we had agreed to on February 17, the March 17 agreement provided for Lin to retain \$285,000 of the fees due to us as payment toward the lease and also provided for us to receive a percentage of any fees collected for two cases that had not yet settled but for which we had completed all of the substantive work.

28. The March 17 agreement specified that \$647,949.99 was to be wired to our checking account within 72 hours after Lin received the Firm's fee for the largest of the cases. The dollar amount was calculated by adding together our fee distribution for the three cases that had settled and subtracting the amount that Lin was retaining for the Lease payment. For the two cases that had not yet settled, the March 17 agreement provided that Lin would pay us our percentages of the Firm's contingency fee within 72 hours after receiving the Firm's fee.

29. The largest of the cases was to be paid on or about July 24, 2020.

30. On July 24, 2020, Lin's lawyer sent us a letter telling us that he was not going to make the required payments to us, ostensibly because client consent was required under Rule 1.5(e) of the ethical rules, and the client did not agree to the payments—despite the fact that client consent clearly was not required since our share came from the Fee's total share as a result of work we performed while we were lawyers of the Firm. Rule 1.5 clearly states that “[p]aragraph e does not prohibit

or regulate the division of fees to be received in the future for work done when lawyers were previously associated in a law firm.” The July 24 letter is Exhibit 13 to Lin’s deposition and is attached to our Brief at Exhibit A, tab 13.

31. Also on July 24, 2020, we learned from media reports that one of the two cases that had not yet settled as of March 17 had also settled and was being funded on or about July 24, 2020. The settlement was confidential, and we did not know the amount of the settlement.

32. Our lawyer responded on our behalf to Lin’s lawyer via correspondence on August 7, advising him that Lin was in breach of the contract and had obviously committed fraud, as his position made it clear that he never intended to perform under the March 17 agreement by paying us. Our lawyer requested that Lin immediately wire us the amount owed under the March settlement agreement, advising that our offer would remain open until August 10. A true and correct copy of this correspondence is attached hereto as Exhibit 6.

33. Lin continued to refuse to pay us what we were owed under the March 17 agreement.

34. On August 25, 2020, our lawyer communicated with Lin’s lawyer, and on our behalf, advised him that we were planning to file a lawsuit for breach of contract and fraud if Lin did not pay us what we were owed. Upon request to wait

and try to settle it, our lawyer agreed to share our complaint if Lin would agree not to pre-emptively sue us. He had previously threatened repeatedly to file civil and/or criminal lawsuits against us.

35. After his lawyer agreed that Lin would not pre-emptively sue us, our lawyer emailed him our complaint, advising him that we would not file it before August 27, 2020, at 5:00 pm. A true and correct copy of this email is attached hereto as Exhibit 7.

36. We did not include any monetary demand with the draft complaint; at that point we had asked only that Lin pay us what he and the Firm owed us under the March 17 agreement.

37. At around 7:00 am the following day, on August 26, Lin began calling certain of our mutual clients and co-counsel to accuse us of being extortionists. I know this because I spoke to one client who said Lin had told her that morning that we were extortionists and who urged us not to sue Lin, and because Lin copied me on an email to another client in which he said that Jonathan, Taylor, and I were planning to sue him in a lawsuit “intended to extort money . . . that they did not earn. . . .” He further stated that “I intend to expose Nicole and her partners publicly.”

38. Our lawyer spoke with Lin’s counsel that afternoon to ask on our behalf that Lin cease from defaming and disparaging us. They agreed to exchange written

offers to try to resolve the dispute. At 5:18 pm that afternoon, our lawyer sent an email on our behalf containing an offer to resolve all outstanding issues for \$1.25 million. Those issues included our claims for breach of contract for failure to pay us the liquidated amount due, fraud, defamation, breach of the non-disparagement agreement, breach of the agreement for failure to pay us the percentage amount due, and a buy-out of the future obligation to pay us a percentage amount for the unsettled case. Lin later published that email on Telegram, and a true and correct copy of the email is attached hereto as Exhibit 8.

39. Although we did not know the dollar amount we were entitled to for the newly settled case, we were able to make an educated estimate based on the largest of the cases that had settled prior to our departure because the case was essentially the same case for the same client, just against a different defendant. Lin had always said that he thought the newly settled case was worth more, and I know he told the opposing party's counsel in the previously settled case that our client would not settle with any other defendants for less than what that defendant had paid.

40. Our lawyer's email indicated that the \$1.25 million offer would remain open until 5:00 pm on Thursday, August 27, which was the date we had previously indicated we would file the complaint if we could not reach an agreement.



41. On August 27, following a request from Lin's counsel, we extended the deadline until noon on Monday, August 31, a copy of which is attached hereto as Exhibit 9.

42. On that same day, our counsel sent Lin a retraction demand for the false statements he made to our clients and co-counsel on August 26.

43. Lin rejected our offer via letter sent on 11:44 am on August 31, without even making a counteroffer, a copy of which is attached hereto as Exhibit 10.

44. We filed our lawsuit in Fulton County Superior Court immediately after receiving Lin's letter rejecting our offer. Our initial Verified Complaint—the one we had shared with Lin on August 25—included claims for breach of contract, fraud, punitive damages, and attorneys' fees.

45. Ten days later, on September 10, we filed an Amended Complaint in which we added a claim for breach of the non-disparagement clause in the March 17 settlement agreement and sought an emergency injunction for specific performance of the non-disparagement clause. That lawsuit remains pending.

46. On October 8, 2020, the court in the Fulton County litigation issued an injunction enjoining Lin from breaching the non-disparagement clause.

47. In May 2021, Lin began posting the accusations of extortion set forth in ¶¶ 3-14 above and in Exhibits 3-6 hereto.

48. On March 22, 2022, we sent Lin a retraction demand for all of the accusations of extortion set forth in ¶¶ 3-14 above and in Exhibits 3-6 hereto. A true and correct copy of that letter is attached to our Complaint in this case as Exhibit A. (Dkt. 1-4 at 4-12).

49. I have never threatened to disclose any information about Lin to anyone.

50. I have never threatened to interfere with Lin's family, with his children, or with his efforts on behalf of Richard Jewell.

51. Through counsel, I advised Lin that Jonathan, Taylor, and I would sue him if we could not settle our claims against him, but that was not a "threat."


52. Lin filed a grievance against me with the Georgia State Bar, and after he encouraged his followers to file grievances against me, a number of them filed grievances as well claiming that I had extorted Lin. All of the grievances were dismissed.

53. I acted in good faith in submitting the settlement offer to Lin on August 26, 2021, because the amount we requested in settlement was a reasonable request to settle the numerous claims we had against Lin at that point.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing testimony is true and correct to the best of my personal knowledge.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing testimony is true and correct to the best of my personal knowledge.

Executed this 17<sup>th</sup> day of April, 2023, in Atlanta, Georgia.



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Nicole Jennings Wade

EXHIBIT "1"

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

NICOLE JENNINGS WADE,  
JONATHAN D. GRUNBERG, and  
G. TAYLOR WILSON,

Plaintiffs,

v.

L. LIN WOOD,

Defendant.

Case No. 1:22-cv-1073-MLB

**PLAINTIFFS' FIRST REQUESTS FOR ADMISSION TO DEFENDANT**

Pursuant to Federal Rule of Civil Procedure 36, Plaintiffs serve the following First Requests for Admission on Defendant L. Lin Wood, which are to be answered in writing within 30 days of service.

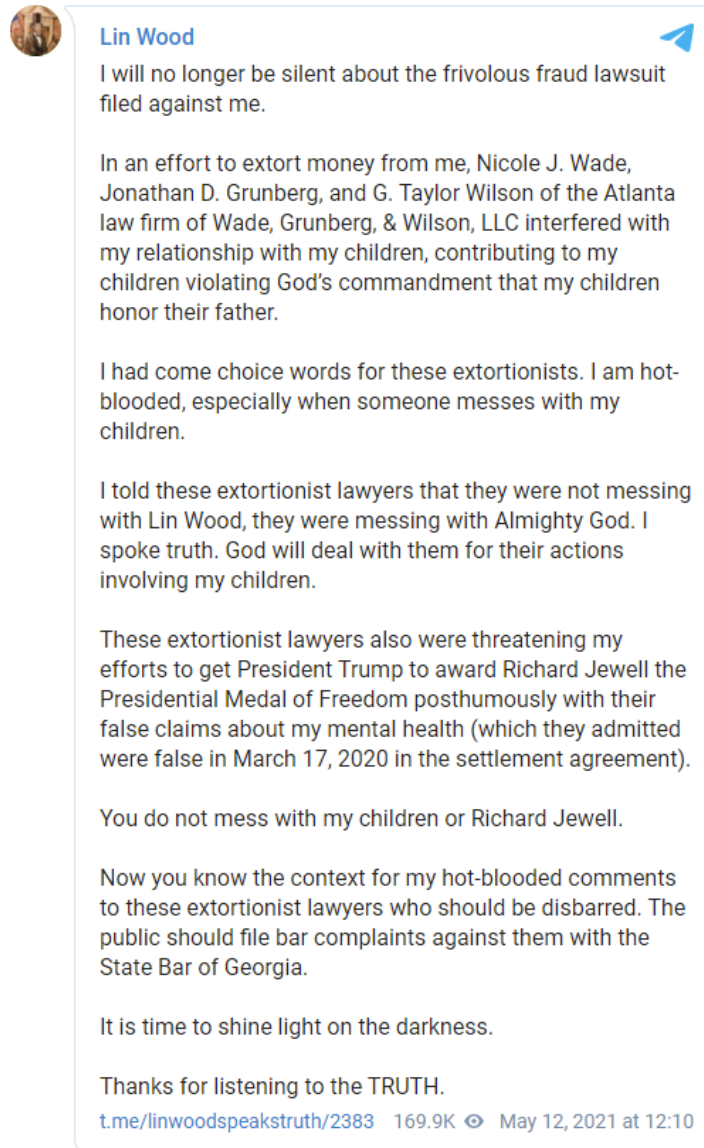
**DEFINITIONS**

A. The terms “You,” “Your,” or “Defendant” shall refer to Defendant L. Lin Wood (“Wood”), his agents, his employees, and/or others you have directed.

**REQUESTS FOR ADMISSION**

1.

Please admit that You posted the following on the social media platform Telegram on or about May 12, 2021:



2.

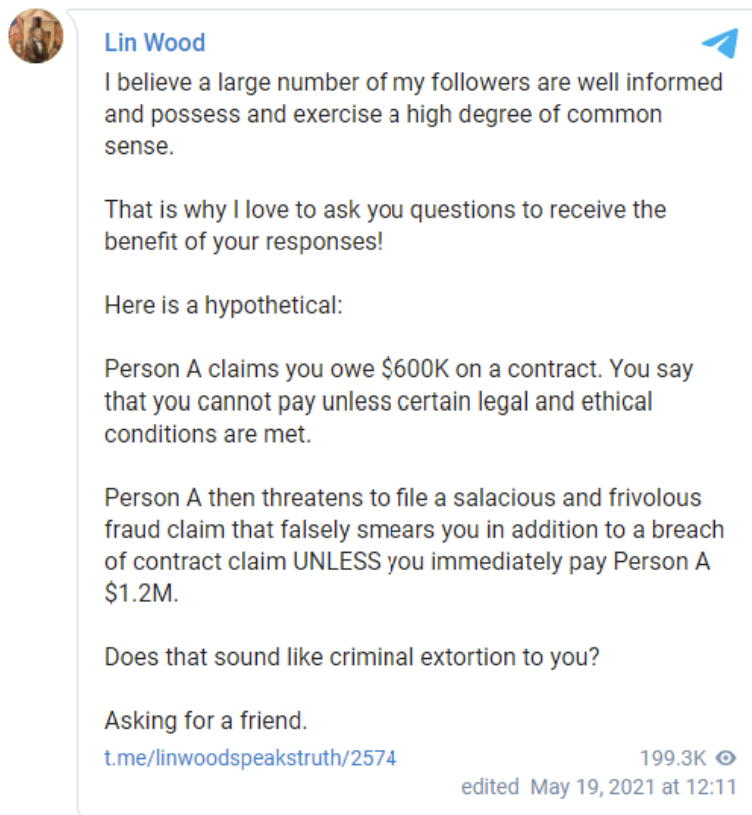
Please admit that You posted the following statements on the social media platform Telegram on or about May 13, 2021:

“I’m gonna tell you the truth about that lawsuit. These people tried to extort money out of me that they didn’t have and didn’t, didn’t, didn’t deserve. . . . So the truth of the matter is it was an extortionist type

attempt by these lawyers ...”

3.

Please admit that You posted the following on the social media platform Telegram on or about May 19, 2021:



4.

Please admit that You posted the following on the social media platform Telegram on or about May 19, 2021:



Lin Wood



Here is a couple of follow ups to the criminal extortion question above.

If you believe Person A is attempting to criminally extort you, (a) do you think Person A's lawyer is also guilty of the crime if the lawyer for Person A conveys the extortion attempt in a letter? and (b) if Person A is a lawyer, should both Person A and Person A's lawyer be subject to potential disbarment for engaging in an attempt to criminally extort you?

Asking for the same friend.

[t.me/linwoodspeakstruth/2575](https://t.me/linwoodspeakstruth/2575) 186.0K May 19, 2021 at 12:20

5.

Please admit that You posted the following on the social media platform Telegram on or about May 19, 2021:





Lin Wood



Under new rules of the State Bar of Georgia (conveniently passed on January 9 so that non-clients from any state could file Bar complaints against me), concerned citizens can file Bar complaints against lawyers who they believe have violated disciplinary rules or engaged in possible criminal conduct (such as attempted extortion).

To file a complaint against any Georgia lawyer, you do not need to be a client nor reside in Georgia. You just have to have information about a Georgia lawyer that concerns you and you feel needs to be investigated.

Here is the link which I provide as a public service.

By the way, Andy, Nicole, Jonathan, & Taylor are Georgia lawyers.

P.S. ALL the power in this country was bestowed by Almighty God to We The People.

<https://www.gabar.org/forthepublic/fileacomplaint.cfm>

[t.me/linwoodspeakstruth/2578](https://t.me/linwoodspeakstruth/2578)

179.4K

edited May 19, 2021 at 12:57

6.

Please admit that You posted the following on the social media platform Telegram on or about May 20, 2021:



**Lin Wood**



Yesterday, I posted the email below and suggested that in my opinion, this demand by Atlanta lawyer Andy Beall of Buckley/Beall and Atlanta lawyers Nicole J. Wade, Jonathan D. Grunberg, and G. Taylor Wilson of Wade, Grunberg, & Wilson, LLC constituted an attempt to extort me.

I know some other lawyers who agree with my opinion.

Today, Andy Beall filed papers with the Court accusing me of wrongdoing for stating my opinion which by the way is a fully protected opinion under the First Amendment.

Wow! Andy, Nicole, Jonathan, and Taylor apparently do not believe in freedom of speech.

I do believe in freedom of speech and I will never stop fighting for free speech and the Bill of Rights.

[t.me/linwoodspeakstruth/2598](https://t.me/linwoodspeakstruth/2598) 166.8K  May 20, 2021 at 18:14

7.

Please admit that You posted the following on the social media platform Telegram on or about May 26, 2021:

**REQUEST FOR ADMISSION NO. 50:**

Admit that you contacted clients or former clients to discuss the lawsuit filed by Plaintiffs against you, and during these communications you referred to the Plaintiffs' suit as extortion and used words to state or imply that Plaintiffs were dishonest.

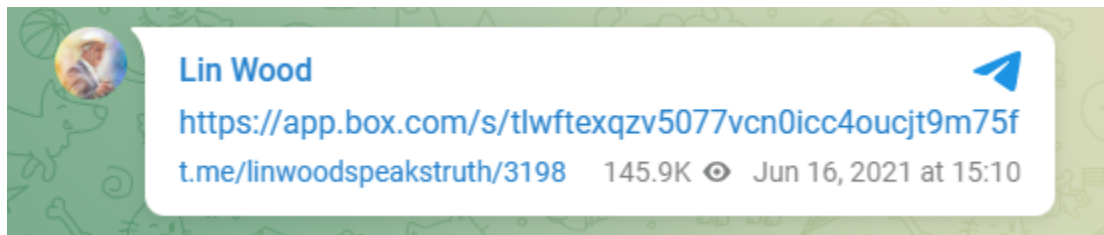
**RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

Mr. Wood admits that he contacted clients in privileged communications concerning the frivolous lawsuit which Plaintiffs were threatening to file against Mr. Wood and L. Lin Wood, P.C. In Mr. Wood's opinion, Plaintiffs committed the crime of attempted extortion and Mr. Wood is still considering whether to pursue criminal actions against Plaintiffs and their counsel. Further, in Mr. Wood's opinion, Plaintiffs are dishonest and unfit to practice law. Except to the extent admitted herein, Request No. 50 is denied.

Respectfully submitted this 26<sup>th</sup> day of May, 2021.

8.

Please admit that You posted the following on the social media platform Telegram on or about June 16, 2021:

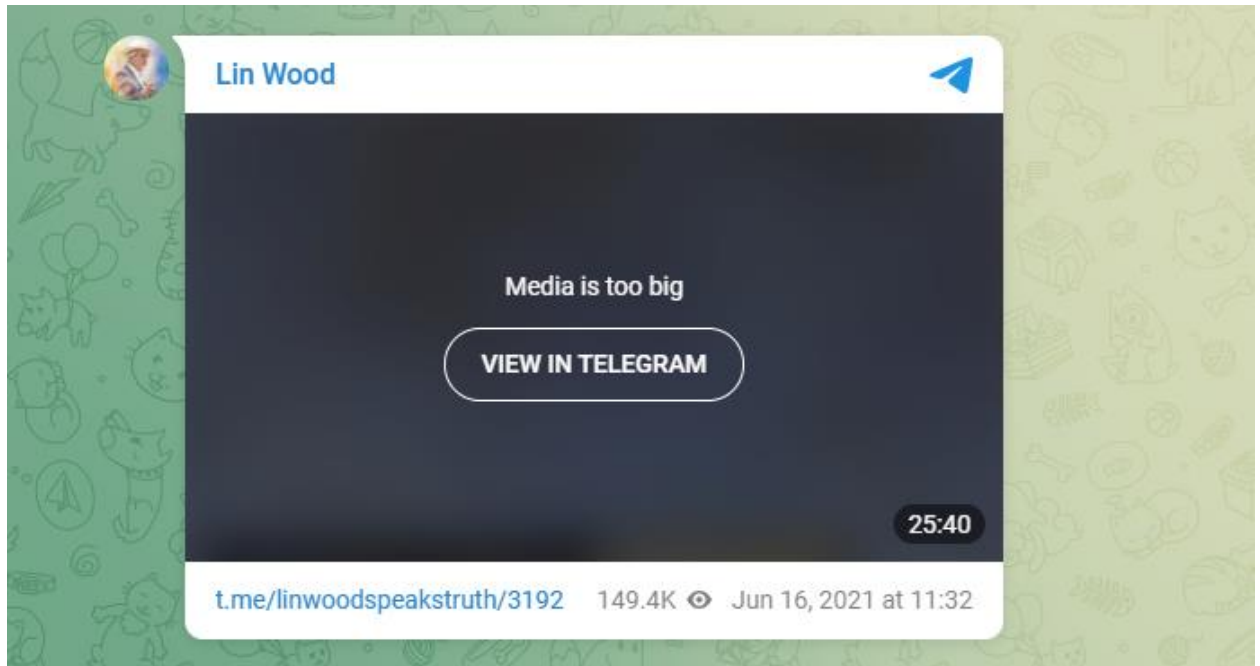


9.

Please admit that the post in Request No. 8 above is a link to the transcript of the deposition for Nicole Wade.

10.

Please admit that You posted the following on the social media platform Telegram on or about June 16, 2021:

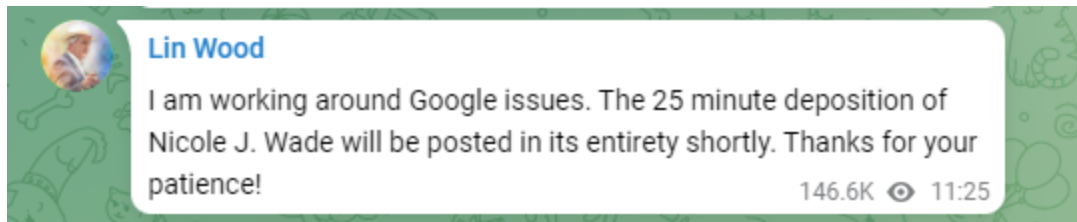


11.

Please admit that the post in Request No. 10 above is a video of the deposition for Nicole Wade.

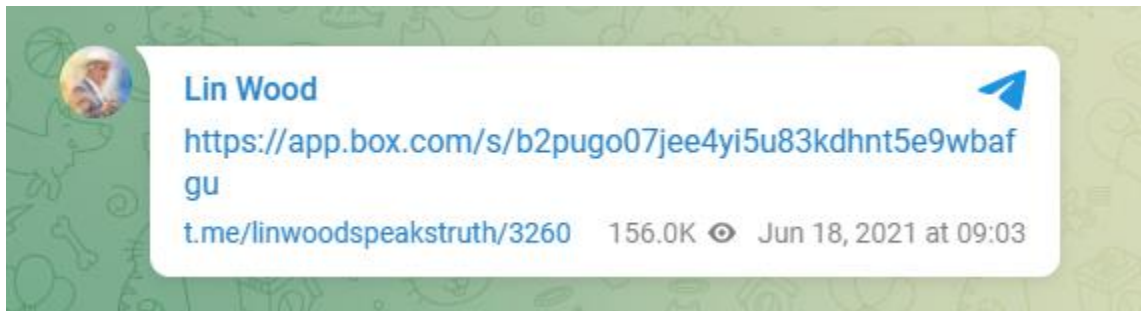
12.

Please admit that You posted the following on the social media platform Telegram on or about June 16, 2021:



13.

Please admit that You posted the following on the social media platform Telegram on or about June 18, 2021:

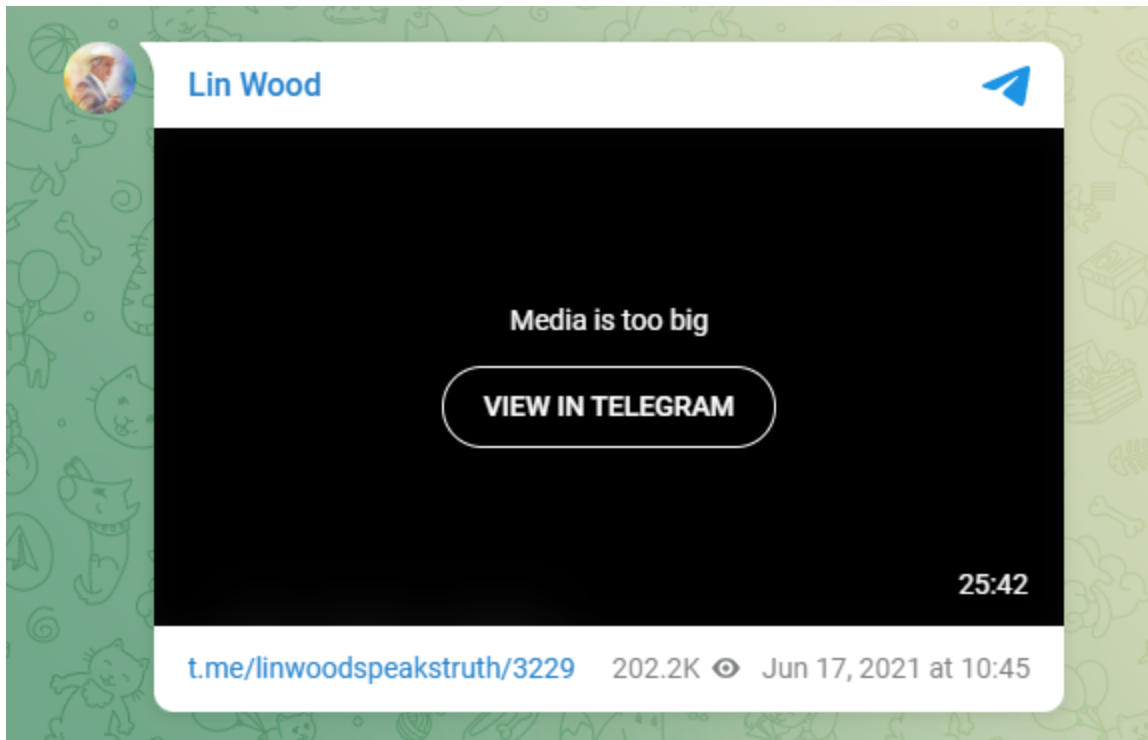


14.

Please admit that the post in Request No. 13 above is a link to the transcript of the deposition for Taylor Wilson.

15.

Please admit that You posted the following on the social media platform Telegram on or about June 17, 2021:

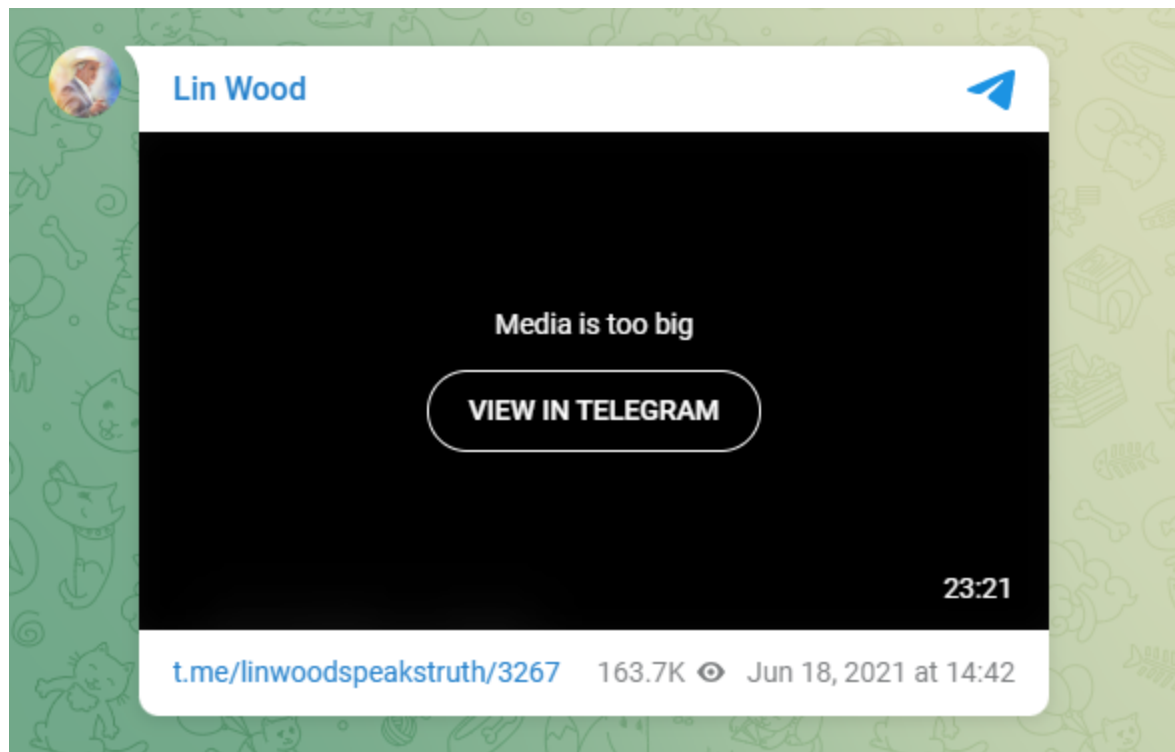


16.

Please admit that the post in Request No. 15 above is a video of the deposition for Taylor Wilson.

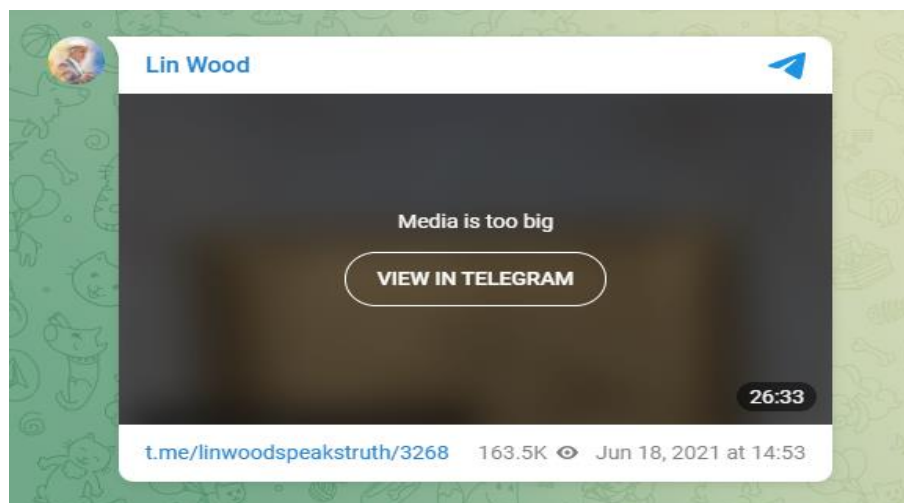
17.

Please admit that You posted the following on the social media platform Telegram on or about June 18, 2021:



18.

Please admit that You posted the following on the social media platform Telegram on or about June 18, 2021:



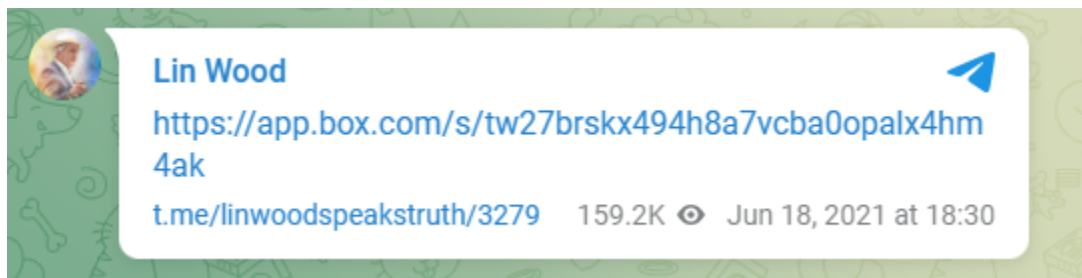


19.

Please admit that the posts in Request Nos. 17 and 18 above are videos of the deposition for Jonathan Grunberg.

20.

Please admit that You posted the following on the social media platform Telegram on or about June 18, 2021:



21.

Please admit that the post in Request No. 20 above is a link to the transcript of the deposition for Jonathan Grunberg.

22.

Please admit that You posted a video and written transcript (Telegram posts referenced in Requests No. 8 and 10 above) thereof containing the following statement by You on the social media platform Telegram on or about June 16, 2021:

“These accusations against me are unfounded, they are frivolous, they were filed for an attempt to do nothing more than to smear me, and to extort from

me monies that the Plaintiffs, Nicole J. Wade, Jonathan D. Grunberg, and G. Taylor Wilson are not entitled to recover.”<sup>1</sup>

23.

Please admit that You posted a video and written transcript thereof containing the following statements by You on the social media platform Telegram on or about June 16, 2021:

“So then I had these lawyers trying to threaten me that they were going to make public their accusations about my mental health at a time when I was scheduled to meet with President Trump to discuss whether the President would award to Richard Jewell the Presidential Metal of Freedom. I also was in the middle of cases against every major member of the media, including CNN and the Washington Post, ABC, NBC, CBS, Gannett, Rolling Stone for Nicholas Sandmann, and I told these lawyers they needed to stop the foolishness about my mental health because it would harm Richard Jewell

---

<sup>1</sup> For the convenience of counsel, the referenced statement may be found at page 7 of 29 of the transcript posted on June 16, 2021. *See* Request No. 8; *see also* <https://t.me/linwoodspeakstruth/3198>.

potentially, or it would harm Nicholas Sandmann, and there was no basis in fact for such accusations. It was an extortion played by these lawyers.”<sup>2</sup>

24.

Please admit that You posted a video and written transcript thereof containing the following statement by You on the social media platform Telegram on or about June 16, 2021:

“I recommended to the client through his local counsel, that they agree to the deal even though I knew it was extortion.”<sup>3</sup>

25.

Please admit that You posted a video and written transcript thereof containing the following statements by You on the social media platform Telegram on or about June 16, 2021:

“They presented me with a draft of their lawsuit, which in the fraud portion of the case went into detail about issues that arose out of their interference with my children’s relationship with me, where they were actively taking

---

<sup>2</sup> For the convenience of counsel, the referenced statement may be found at page 11 of 29 of the transcript posted on June 16, 2021. *See* Request No. 8; *see also* <https://t.me/linwoodspeakstruth/3198>.

<sup>3</sup> For the convenience of counsel, the referenced statement may be found at page 12 of 29 of the transcript posted on June 16, 2021. *See* Request No. 8; *see also* <https://t.me/linwoodspeakstruth/3198>.

steps and doing things that in essence had my children not honoring their father. That is a violation of one of God's commandments. I know at one point in time, I told them, I said you are not messing with Lin Wood, you are messing with Almighty God. It's his commandment, not mine. They put that stuff in the fraud complaint among other things that were scandalous, irrelevant, immaterial, to even a fraud claim. They did that to smear me and to try to get me to pay this money.”<sup>4</sup>

26.

Please admit that You posted a video and written transcript thereof containing the following statement by You on the social media platform Telegram on or about June 16, 2021:

“I was trying to help them even though they had tried to extort me.”<sup>5</sup>

---

<sup>4</sup> For the convenience of counsel, the referenced statement may be found at pages 14-15 of 29 of the transcript posted on June 16, 2021. *See* Request No. 8; *see also* <https://t.me/linwoodspeakstruth/3198>.

<sup>5</sup> For the convenience of counsel, the referenced statement may be found at page 18 of 29 of the transcript posted on June 16, 2021. *See* Request No. 8; *see also* <https://t.me/linwoodspeakstruth/3198>.

27.

Please admit that You posted a video and written transcript thereof containing the following statement by You on the social media platform Telegram on or about June 16, 2021:

“You don’t use the court system to extort people.”<sup>6</sup>

28.

Please admit that You posted a video and written transcript thereof containing the following statements by You on the social media platform Telegram on or about June 18, 2021:

“They were trying to extort me. Almost blackmail me. \$1.5 million? How did the value of the case go up three times? I told them to file it. They did. The law does not sanction lawyers’ engaging in such conduct to try to extort money from another party based on threats of filing frivolous and smears in a lawsuit. It shouldn’t be tolerated.”<sup>7</sup>

---

<sup>6</sup> For the convenience of counsel, the referenced statement may be found at page 21 of 29 of the transcript posted on June 16, 2021. *See* Request No. 8; *see also* <https://t.me/linwoodspeakstruth/3198>.

<sup>7</sup> For the convenience of counsel, the referenced statement may be found at page 20 of 26 of the transcript posted on June 18, 2021. *See* Request No. 13; *see also* <https://t.me/linwoodspeakstruth/3260>.

29.

Please admit that You posted a video and written transcript thereof containing the following statement by You on the social media platform Telegram on or about June 18, 2021:

“[T]heir unfortunately – it’s the truth – extortion that they tried to successfully, now unsuccessfully obtain from me.”<sup>8</sup>

30.

Please admit that You posted a video and written transcript thereof containing the following statement by You on the social media platform Telegram on or about June 18, 2021:

“I was willing to live up to the agreement even though it was extortion.”<sup>9</sup>

31.

Please admit that You posted a video and written transcript thereof containing the following statements by You on the social media platform Telegram on or about June 18, 2021:

---

<sup>8</sup> For the convenience of counsel, the referenced statement may be found at page 17 of 46 of the transcript posted on June 18, 2021. *See* Request No. 20; *see also* <https://t.me/linwoodspeakstruth/3279>.

<sup>9</sup> For the convenience of counsel, the referenced statement may be found at page 18 of 46 of the transcript posted on June 18, 2021. *See* Request No. 20; *see also* <https://t.me/linwoodspeakstruth/3279>.

“Because they told me if I didn’t agree to pay them \$1.5 million, 1.25 in cash, and to pay for their share of the office lease -- which the building had told them they owed three-fourths of -- we had an office-sharing arrangement -- that if I didn’t pay \$1.5 million to him immediately, he was going to sue that case and, you know, in essence, listen, do exactly what he did, smear my name, have that complaint circulated all over the country for people to attack me and to accuse me and to smear my reputation. That’s blackmail. That’s extortion, in my view.”<sup>10</sup>

32.

Please admit that You posted a video and written transcript thereof containing the following statement by You on the social media platform Telegram on or about June 18, 2021:

“Never heard another word about it from the boy until I -- all of a sudden, to try to extort me, he puts in a claim that I assaulted him.”<sup>11</sup>

---

<sup>10</sup> For the convenience of counsel, the referenced statement may be found at pages 20-21 of 46 of the transcript posted on June 18, 2021. *See* Request No. 20; *see also* <https://t.me/linwoodspeakstruth/3279>.

<sup>11</sup> For the convenience of counsel, the referenced statement may be found at page 23 of 46 of the transcript posted on June 18, 2021. *See* Request No. 20; *see also* <https://t.me/linwoodspeakstruth/3279>.



33.

Please admit that You posted a video and written transcript thereof containing the following statement by You on the social media platform Telegram on or about June 18, 2021:

“I don’t know how Jonathan knows anything about it, but nothing was ever said about it after the event until they put it into this lawsuit where they tried to extort me to have me pay them \$1.5 million in a case that even they claim is only worth \$647,000, after they get the benefit of \$280,000 that I was to pay for their share of the lease.”<sup>12</sup>

34.

Admit that Plaintiffs did not attempt to extort You at any time.

35.

Admit that Plaintiffs did not extort You at any time.

36.

Admit that You received correspondence from Plaintiffs’ counsel Andrew M. Beal dated March 8, 2022, demanding that You retract Your defamatory statements regarding Plaintiffs.

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<sup>12</sup> For the convenience of counsel, the referenced statement may be found at page 26 of 46 of the transcript posted on June 18, 2021. *See* Request No. 20; *see also* <https://t.me/linwoodspeakstruth/3279>.

37.

Admit that you received Plaintiffs' demand for retraction dated March 8, 2022.

38.

Admit that you responded to Plaintiffs' demand for retraction by email on or around March 15<sup>th</sup>, 2022 at 10:59 a.m.

39.

Admit that you have not withdrawn or retracted any of your statements that the Plaintiffs are extortionists or have committed extortion of you.

40.

Please admit that You have the means to post content to the Telegram channel <https://t.me/linwoodspeakstruth>.

41.

Please admit that You have the means to remove content from the Telegram channel <https://t.me/linwoodspeakstruth>.

42.

Please admit that You have control over the Telegram channel <https://t.me/replytolinwood>.

43.

Please admit that You have the means to post content to the Telegram channel <https://t.me/replytolinwood>.

44.

Please admit that You have the means to remove content from the Telegram channel <https://t.me/replytolinwood>.

This 19<sup>th</sup> day of July, 2022.

/s/Andrew M. Beal

Andrew M. Beal  
abeal@buckleybeal.com  
Georgia Bar No. 043842  
Milinda Brown  
mbrown@buckleybeal.com  
Georgia Bar No. 363307

BUCKLEY BEAL LLP  
600 Peachtree Street, NE  
Suite 3900  
Atlanta, Georgia 30308  
T: (404) 781-1100  
F: (404) 688-2988  
*Attorneys for Plaintiffs*

**CERTIFICATION UNDER L.R. 7.1D.**

Pursuant to Northern District of Georgia Civil Local Rule 7.1D, the undersigned counsel certifies that this PLAINTIFFS' FIRST REQUESTS FOR ADMISSION TO DEFENDANT is a computer document and was prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1C.

This 19<sup>th</sup> day of July, 2022.

/s/ Andrew M. Beal

Andrew M. Beal

abeal@buckleybeal.com

Georgia Bar No. 043842

Milinda Brown

mbrown@buckleybeal.com

Georgia Bar No. 363307

BUCKLEY BEAL LLP  
600 Peachtree Street, NE  
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Atlanta, Georgia 30308  
T: (404) 781-1100  
F: (404) 688-2988  
*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

NICOLE JENNINGS WADE,  
JONATHAN D. GRUNBERG, and  
G. TAYLOR WILSON,

Plaintiffs,

v.

L. LIN WOOD,

Defendant.

Case No. 1:22-cv-1073-MLB

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I served *Plaintiffs' First Requests for Admission to Defendant* by sending same to Defendant's attorneys of record in the above-captioned matter via United States Mail, postage pre-paid, and via electronic mail, as follows:

R. Christopher Harrison  
Downey & Cleveland, LLP  
288 Washington Avenue  
Marietta, GA 30060  
[harrison@downeycleveland.com](mailto:harrison@downeycleveland.com)

L. Lin Wood  
L. Lin Wood, P.C.  
P.O. Box 52584  
Atl, GA 30355  
[lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Ibrahim Reyes  
Reyes Lawyers, P.A.  
236 Valencia Avenue  
Coral Gables, FL 33134  
ireyes@reyeslawyers.com

Respectfully submitted, this the 19th day of July, 2022.

/s/ Andrew M. Beal

Andrew M. Beal  
Georgia Bar No. 043842  
[abeal@buckleybeal.com](mailto:abeal@buckleybeal.com)  
Milinda L. Brown  
Georgia Bar No. 363307  
[mbrown@buckleybeal.com](mailto:mbrown@buckleybeal.com)

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600 Peachtree Street, NE  
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T: (404) 781-1100  
F: (404) 688-2988  
*Counsel for Plaintiffs*

EXHIBIT "2"

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

NICOLE JENNINGS WADE,	)	
JONATHAN D. GRUNBERG, and	)	
G. TAYLOR WILSON	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION
v.	)	
	)	
L. LIN WOOD,	)	FILE NO. 1:22-CV-01073
	)	
Defendant.	)	
_____	)	

**DEFENDANT'S RESPONSES TO PLAINTIFFS' FIRST REQUEST FOR  
ADMISSIONS**

COMES NOW, Defendant L. LIN WOOD, and responds to Plaintiffs' First Request for Admissions as follows:

1.

Defendant admits the averments contained in paragraph 1 of Plaintiffs' Request for Admissions.

2.

Defendant admits the averments contained in paragraph 2 of Plaintiffs' Request for Admissions.

3.

Defendant admits the averments contained in paragraph 3 of Plaintiffs'

Request for Admissions.

4.

Defendant admits the averments contained in paragraph 4 of Plaintiffs' Request for Admissions.

5.

Defendant admits the averments contained in paragraph 5 of Plaintiffs' Request for Admissions.

6.

Defendant admits the averments contained in paragraph 6 of Plaintiffs' Request for Admissions.

7.

Defendant admits the averments contained in paragraph 7 of Plaintiffs' Request for Admissions.

8.

Defendant admits the averments contained in paragraph 8 of Plaintiffs' Request for Admissions.

9.

Defendant admits the averments contained in paragraph 9 of Plaintiffs' Request for Admissions.



10.

Defendant admits the averments contained in paragraph 10 of Plaintiffs' Request for Admissions.

11.

Defendant admits the averments contained in paragraph 11 of Plaintiffs' Request for Admissions.

12.

Defendant admits the averments contained in paragraph 12 of Plaintiffs' Request for Admissions.

13.

Defendant admits the averments contained in paragraph 13 of Plaintiffs' Request for Admissions.

14.

Defendant admits the averments contained in paragraph 14 of Plaintiffs' Request for Admissions.

15.

Defendant admits the averments contained in paragraph 15 of Plaintiffs' Request for Admissions.

16.

Defendant admits the averments contained in paragraph 16 of Plaintiffs'

Request for Admissions.

17.

Defendant admits the averments contained in paragraph 17 of Plaintiffs' Request for Admissions.

18.

Defendant admits the averments contained in paragraph 18 of Plaintiffs' Request for Admissions.

19.

Defendant admits the averments contained in paragraph 19 of Plaintiffs' Request for Admissions.

20.

Defendant admits the averments contained in paragraph 20 of Plaintiffs' Request for Admissions.

21.

Defendant admits the averments contained in paragraph 21 of Plaintiffs' Request for Admissions.

22.

Defendant admits the averments contained in paragraph 22 of Plaintiffs' Request for Admissions.

23.

Defendant admits the averments contained in paragraph 23 of Plaintiffs' Request for Admissions.

24.

Defendant admits the averments contained in paragraph 24 of Plaintiffs' Request for Admissions.

25.

Defendant admits the averments contained in paragraph 25 of Plaintiffs' Request for Admissions.

26.

Defendant admits the averments contained in paragraph 26 of Plaintiffs' Request for Admissions.

27.

Defendant admits the averments contained in paragraph 27 of Plaintiffs' Request for Admissions.

28.

Defendant admits the averments contained in paragraph 28 of Plaintiffs' Request for Admissions.

29.

Defendant admits the averments contained in paragraph 29 of Plaintiffs'

Request for Admissions.

30.

Defendant admits the averments contained in paragraph 30 of Plaintiffs' Request for Admissions.

31.

Defendant admits the averments contained in paragraph 31 of Plaintiffs' Request for Admissions.

32.

Defendant admits the averments contained in paragraph 32 of Plaintiffs' Request for Admissions.

33.

Defendant admits the averments contained in paragraph 33 of Plaintiffs' Request for Admissions.

34.

Defendant denies the averments contained in paragraph 34 of Plaintiffs' Request for Admissions.

35.

Defendant denies the averments contained in paragraph 35 of Plaintiffs' Request for Admissions.

36.

Defendant admits the averments contained in paragraph 36 of Plaintiffs' Request for Admissions.

37.

Defendant admits the averments contained in paragraph 37 of Plaintiffs' Request for Admissions.

38.

Defendant admits the averments contained in paragraph 38 of Plaintiffs' Request for Admissions.

39.

Defendant admits the averments contained in paragraph 39 of Plaintiffs' Request for Admissions.

40.

Defendant admits the averments contained in paragraph 40 of Plaintiffs' Request for Admissions.

41.

Defendant admits the averments contained in paragraph 41 of Plaintiffs' Request for Admissions.

42.

Defendant admits the averments contained in paragraph 42 of Plaintiffs'

Request for Admissions.

43.

Defendant admits the averments contained in paragraph 43 of Plaintiffs’

Request for Admissions.

44.

Defendant admits the averments contained in paragraph 44 of Plaintiffs’

Request for Admissions.

This 31<sup>st</sup> day of August, 2022.

Respectfully submitted,

**DOWNEY & CLEVELAND, LLP**

By: /s/ R. CHRISTOPHER HARRISON  
R. CHRISTOPHER HARRISON  
Georgia State Bar No. 333199  
harrison@downeycleveland.com  
Attorney for Defendant

Downey & Cleveland, LLP  
288 Washington Avenue  
Marietta, GA 30060-1979  
T: 770-422-3233  
F: 770-423-4199

**L. LIN WOOD, P.C.**

By: /s/ L. LIN WOOD

L. Lin Wood

Georgia State Bar No. 774588

[lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

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P.O. Box 52584  
Atlanta, GA 30355  
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F: 404-506-9111

**REYES LAWYERS, P.A.**

By: /s/ IBRAHIM REYES

Ibrahim Reyes

Florida State Bar No. 581798

[ireyes@reyeslawyers.com](mailto:ireyes@reyeslawyers.com)

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236 Valencia Avenue  
Coral Gables, FL 33134  
T: 305-445-0011  
F: 305-445-1181

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D) of the Northern District of Georgia, I hereby certify that this pleading has been prepared in compliance with Local Rule 5.1(C) using 14-point Times New Roman Font.

Respectfully submitted,

**DOWNEY & CLEVELAND, LLP**

By: /s/ R. Christopher Harrison  
R. CHRISTOPHER HARRISON  
Georgia State Bar No. 333199  
harrison@downeycleveland.com  
Attorneys for Defendant



**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Andrew M. Beal, Esq.  
Milinda Brown, Esq.  
Buckley Beal LLP  
600 Peachtree Street, NE  
Suite 3900  
Atlanta, GA 30308

This 31<sup>st</sup> day of August, 2022.

**DOWNEY & CLEVELAND, LLP**

By: /s/ R. Christopher Harrison  
R. CHRISTOPHER HARRISON  
Georgia State Bar No. 333199

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

---

NICOLE WADE; JONATHAN :  
GRUNBERG; TAYLOR WILSON; :  
WADE, GRUNBERG & WILSON, :  
LLC, :  
Plaintiffs, :  
:  
vs. :  
:  
L. LIN WOOD AND L. LIN :  
WOOD, P.C., :  
Defendants. : No. 2020-CV-339937

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WITNESS: NICOLE WADE (NO SHOW)

PAGES: 1 through 28

PLACE: Huseby Litigation  
1201 West Peachtree Street, NW  
One Atlantic Center  
Suite 2300  
Atlanta, Georgia 30309

DATE: Wednesday, June 16, 2021

TIME: 9:00 a.m.

1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs:

3 ANDREW M. BEAL, ESQUIRE  
Buckley Beal, LLP  
4 600 Peachtree Street, NE  
Suite 3900  
5 Atlanta, Georgia 30308  
abeal@buckleybeal.com  
6 (Not Present)

7 On behalf of Defendants:

8 L. LIN WOOD, ESQUIRE  
And  
9 JOHN EXUM, ESQUIRE  
L. Lin Wood, PC  
10 Suite 2400  
Regions Plaza  
11 1180 West Peachtree Street, NW  
Atlanta, Georgia 30309  
12 lwood@linwoodlaw.com

13 And

14 IBRAHIM REYES, ESQUIRE  
Reyes Lawyers, P.A.  
15 236 Valencia Avenue  
Coral Gables, Florida 33134  
16 ireyes@reyeslawyers.com

17 Also Present:

18 Alex Gallo, Videographer  
Mitch Lash  
19 Roberto Barros

20

21

22

23

24

WITNESSES:	PAGE
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By Mr. Reyes 4

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EXHIBITS: MARKED RECEIVED

No Exhibits Marked

1 -----

2 VIDEO OPERATOR: This will be  
3 tape number one to the videotaped  
4 deposition of Nicole Wade, taken in the  
5 matter of Nicole Wade, et al versus L.  
6 Lin Wood.

7 Today's deposition is being  
8 held on June 16th, 2021, and the time  
9 is now 9:22 a.m.

10 Will all counsel please  
11 introduce themselves for the record.

12 MR. WOOD: My name is Lin Wood  
13 I am the Defendant and also counsel for  
14 both Defendants, myself and my law firm  
15 L. Lin Wood, PC.

16 MR. REYES: This is Ibrahim  
17 Reyes, I represent the Defendants.

18 MR. EXUM: This is John Exum,  
19 I am a summer associate at L. Lin Wood,  
20 PC.

21 MR. REYES: We noticed for a  
22 deposition the deponent Nicole Wade on  
23 May 10th, 2021. Her counsel asked that  
24 the deposition be changed to another

25 place because their office was too

5

1 small, so we served an Amended Notice  
2 of Deposition on Nicole Wade on June  
3 2nd, 2021, two weeks ago.

4 A Motion for Protective Order  
5 was filed by the Plaintiffs naturally,  
6 which is a Protective Order and not  
7 self executing, there was no hearing  
8 and no order, so we are here in the and  
9 the deponent and her lawyers are not  
10 here.

11 It is 9:24 a.m. The  
12 deposition was noticed for 9 a.m.

13 MR. WOOD: So this is Mr.  
14 Wood.

15 The importance of this  
16 deposition was well known to Nicole  
17 Wade and her lawyer Andy Beal of  
18 Buckley Beal in Atlanta, Georgia,  
19 because they were aware that the  
20 allegations, unproven allegations in  
21 this lawsuit filed against me and my  
22 professional corporation, were being  
23 relied upon by the State Bar of Georgia  
24 Grievance Committee to bring an action

25 against me seeking to discipline me

6

1 even up to the penalty of disbarment.  
2 The State Bar of Georgia agreed that  
3 they would not consider my case until  
4 July, and the State Bar of Georgia  
5 wanted the benefit of reading the  
6 deposition testimony of Nicole J Wade,  
7 Jonathan D. Grunberg and G. Taylor  
8 Wilson to evaluate the lawsuit that  
9 they filed against me.

10 We contend that the lawsuit  
11 filed against me in a civil case has no  
12 relevance and cannot as a matter of law  
13 be used by the State Bar of Georgia  
14 because their unproven accusations.  
15 Nonetheless, it would have been  
16 critically important to my defense with  
17 the State Bar, to have these  
18 depositions taken of record and  
19 provided to the State Bar by the end of  
20 June. Now because Ms. Wade has chosen  
21 not to show up, we are going to have to  
22 ask the State Bar to extend the time so  
23 that we can get these depositions taken  
24 and the testimony represented to the

25 State Bar, which I believe will show

7

1 that these accusations against me are  
2 unfounded, they are frivolous, they  
3 were filed for an attempt to do nothing  
4 more than to smear me, and to extort  
5 from me monies that the Plaintiffs,  
6 Nicole J. Wade, Jonathan D. Grunberg,  
7 and G. Taylor Wilson are not entitled  
8 to recover.

9 So I expected clearly the  
10 testimony in the case from Nicole Wade  
11 to show, that Nicole Wade has known me  
12 since 2006 when I joined the law firm  
13 of Powell, Goldstein and became lead  
14 counsel in a case filed by certain  
15 individuals against SunTrust Bank.  
16 SunTrust Bank asked me to be the lead  
17 counsel in the case, Nicole had been  
18 working on it for a number of years and  
19 she worked under me, and we had a very  
20 successful result for SunTrust Bank.

21 I used Nicole during the time  
22 period I was a lawyer at Powell,  
23 Goldstein, which lawyer became Bryan,  
24 Cave, I used her in a number of case to



25 help me. She is a smart lawyer, too

8

1 smart to have filed this frivolous  
2 lawsuit, that is why I wanted to ask  
3 her about it today.

4 Around 2011, I left Bryan,  
5 Cave to start my own firm again to  
6 handle a whistleblower case against  
7 Divata, a case that four years later  
8 resolved for the largest amount of  
9 money ever paid in a non-intervened  
10 false claims act case, \$495,000,000.00.

11 I also in my new firm had  
12 handled a case against Halifax, another  
13 whistleblower case that had resolved in  
14 2014 for \$92,000,000.00, the largest  
15 start case ever resolved in the United  
16 States.

17 Nicole, and I would have asked  
18 her about this today, had a very  
19 checkered history at Powell, Goldstein  
20 and Bryan, Cave. I am not going to go  
21 into that for purposes of the record  
22 other than to say, that we had sought  
23 the personnel file of Ms. Wade and she  
24 objected to its production. We will

25 continue to insist that it be produced.

9

1 Nicole for reasons I think  
2 would have been evident today from the  
3 testimony, had to leave Bryan, Cave in  
4 2015. She started her own law firm,  
5 Wade Law, LLC, and came and talked to  
6 me about it, and I recognized having  
7 started my own law firm back in 1983  
8 and restarted my firm again in 2011,  
9 that it was very difficult and  
10 expensive to start a law firm, even a  
11 small firm. So I offered to Nicole an  
12 opportunity to come to my office and to  
13 share space with me so that she would  
14 have no cost initially for lease, she  
15 would have no cost for a receptionist,  
16 an administrative assistant, I tried to  
17 help her. She was never a partner in  
18 my law firm, L. Lin Wood, PC.

19 I am not going to go into the  
20 background of Jonathan Grunberg and G.  
21 Taylor Wilson, but we will do that  
22 tomorrow and Friday if they show up for  
23 the depositions.

24 When their came a time that I

25 had recovered a significant fee for a

10

1 client and I had used Nicole to help me  
2 on a case by case basis in her law  
3 firm, as I did with Jonathan and  
4 Taylor, they had their own law firms,  
5 Grunberg & Wilson, LLC, I believe  
6 Taylor has G. Taylor Wilson, PC and  
7 Jonathan Grunberg has Jonathan D.  
8 Grunberg, PC, they were never members  
9 or partners of my law firm. They did  
10 share space with me. I did ask them to  
11 help me on a case by case basis and we  
12 would always reach an agreement on how  
13 they would be compensated.

14 I had a case settle, a case  
15 for [REDACTED] against CNN and  
16 these three lawyers had done some work  
17 on it, not much, and then they did not  
18 made an agreement with me about how to  
19 be compensated. The long story short,  
20 is there was a dispute about what they  
21 should receive. They wanted to receive  
22 upwards of \$900,000.00, and when that  
23 issue came up, they started telling  
24 people that I needed mental healthcare

25 treatment. My children have been

11

1 saying things similar to that because I  
2 had apparently talked too much about my  
3 faith in God, and I think it scared my  
4 kids because I felt secure about my  
5 life. So then I had these lawyers  
6 trying to threaten me that they were  
7 going to make public their accusations  
8 about my mental health at a time when I  
9 was scheduled to meet with President  
10 Trump to discuss whether the President  
11 would award to Richard Jewell the  
12 Presidential Metal of Freedom. I also  
13 was in the middle of cases against  
14 every major member of the media,  
15 including CNN and the Washington Post,  
16 ABC, NBC, CBS, Gannett, Rolling Stone  
17 for [REDACTED], and I told these  
18 lawyers they needed to stop the  
19 foolishness about my mental health  
20 because it would harm Richard Jewell  
21 potentially, or it would harm Nicholas  
22 Sandmann, and there was no basis in  
23 fact for such accusations. It was an  
24 extortion played by these lawyers.

25 When I finally made the mistake of

12

1 making a deal with them, all of a  
2 sudden my mental health was fine. They  
3 signed a settlement agreement stating  
4 that on information and belief, that I  
5 was mentally competent in all aspects  
6 and had been for the many months before  
7 then. It was extortion.

8 I had a law firm draw up a fee  
9 sharing agreement, Alston & Bird.

10 Well, they missed the fact that the law  
11 in Georgia requires client consent.  
12 They didn't tell me about that until  
13 almost two months after I had entered  
14 into the agreement with Wade, Grunberg  
15 & Wilson. And so when it came time for  
16 the case to be settled, the client had  
17 to consent to what they were going to  
18 be paid. I recommended to the client  
19 through his local counsel, that they  
20 agree to the deal that I had presented  
21 even though I knew it was extortion. I  
22 just wanted to be rid of these people.

23 The client insisted that before he  
24 could make a decision, he wanted to see

25 their time records to make sure that

13

1 the fee was reasonable in relationship  
2 to the services rendered. That is the  
3 law in Kentucky, that is the law in  
4 Georgia. Instead of presenting him  
5 with the timesheets as required by the  
6 Professional Canons of Ethics because  
7 they are the client's records, Wade and  
8 Grunberg and Wilson refused to produce  
9 them, I believe, and I would have asked  
10 Nicole today about why she didn't  
11 produce them. And I think the answer  
12 would have been because either they  
13 didn't keep them as they were required  
14 to do or that they showed that their  
15 time in the case was minimal.  
16 Nonetheless, instead of providing the  
17 client with the records, these people  
18 turned around and sued me for breach of  
19 contract. A contract that I admit I  
20 should not have entered into, but that  
21 I did enter into in good faith and that  
22 I adhered to, to the letter, and was  
23 trying to make sure that the Bar rule  
24 requiring client consent was followed.

25 So instead of giving the client the

14

1 records as he requested, a violation of  
2 the Bar rule, they sued me for breach  
3 of contract, even though I had lived up  
4 to the agreement, had lived up to the  
5 Bar rules and they had not.

6 And then I was informed by  
7 them that not only were they going to  
8 sue me for breach of contract, they  
9 were going to sue me for fraud in the  
10 inducement claiming that I never  
11 intended to pay them. That was made up  
12 by the whole cloth. They presented me  
13 with a draft of their lawsuit, which in  
14 the fraud portion of the case went into  
15 detail about issues that arose out of  
16 their interference with my children's  
17 relationship with me, where they were  
18 actively taking steps and doing things  
19 that in essence had my children not  
20 honoring their father. That is a  
21 violation of one of God's commandments.  
22 I know at one point in time, I told  
23 them, I said you are not messing with  
24 Lin Wood, you are messing with Almighty

25 God. It's his commandment, not mine.

15

1 They put that stuff in the fraud  
2 complaint among other things that were  
3 scandalous, irrelevant, immaterial, to  
4 even a fraud claim. They did that to  
5 smear me and to try to get me to pay  
6 them this money. I didn't do it. I  
7 told them to file it.

8 They filed it and since the  
9 time they filed it, that Complaint has  
10 been utilized across the nation by  
11 people who are enemies to President  
12 Trump, that are enemies of mine. I  
13 don't have a lot of friends in the  
14 media, check my record. I wanted to  
15 ask Nicole about that today. They  
16 claim that I assaulted Jonathan  
17 Grunberg. The Bar of Georgia is  
18 saying, well, you -- they say you  
19 assaulted Jonathan Grunberg. I wanted  
20 to ask her what she knew about that,  
21 because I know exactly what happened in  
22 October of 2019, in California at the  
23 Beverly Hilton Hotel.

24 When Jonathan was with me in



25 depositions in a against Elon Musk, and

16

1 we finished the day's depositions, I  
2 went back to the hotel, I went to look  
3 for my briefcase which had everything  
4 in it I needed and I couldn't find it.  
5 And in a panic I had basically gone to  
6 every possible place in the hotel I  
7 could have been looking for it,  
8 checking with the front desk repeatedly  
9 and calling Jonathan Grunberg to find  
10 out if he had it. He didn't answer the  
11 call, didn't return my messages. I  
12 probably left him 10 messages over the  
13 course of an hour. Someone then told  
14 me they thought they had seen him  
15 downstairs. I went downstairs and he  
16 was sitting in a restaurant with a full  
17 meal next to a beautiful fountain of  
18 water with his phone turned out. Now,  
19 any lawyer that knows when you take a  
20 young lawyer with you out of town on  
21 deposition, you leave your phone on  
22 because you don't know when the boss is  
23 going to call, especially when you know  
24 the next morning early you have got

25 depositions, and you should that the

17

1 boss' briefcase is in your room locked  
2 up. So when I found him, I had some  
3 choice words to say to him. Told him  
4 to get up off the table, get in the  
5 elevator and get my briefcase. He got  
6 on the elevator, he bowed up his chest,  
7 stuck it against my chest and I shoved  
8 him and I said, you do that again I  
9 will whip your ass. Now, if anybody  
10 assaulted anybody, he assaulted me. He  
11 created the problem, but the Bar Exam  
12 is accusing me of assault. Nicole  
13 would tell you that she doesn't know  
14 what happened that day. The only  
15 people that know what happened that day  
16 are Jonathan Grunberg and Lin Wood, and  
17 we have a dispute about what occurred.  
18 Why in the world with the Bar  
19 Association try to discipline me in a  
20 disputed accusation that will never be  
21 proven, and what would assault have to  
22 do with fraud? Nothing. What would my  
23 conversations about my faith in God and  
24 my children have to do with fraud?

25 Nothing. They claim I never intended

18

1 to pay them. They don't tell the truth  
2 to people. I wanted to make Nicole  
3 confront the truth, that after the  
4 agreement was entered into and we found  
5 out the payment would be delayed due to  
6 Covid, I offered these young lawyers a  
7 \$500,000.00 line of credit to help them  
8 sustain themselves until the money  
9 under the agreement could be paid.  
10 From the time we entered into the  
11 agreement, March the 17th, until they  
12 learned that they had to give the  
13 timesheets and they refused to do so, I  
14 referred these lawyers over 40 cases,  
15 their lives. I was trying to help them  
16 even though they had tried to extort  
17 me. I wanted to ask Nicole Wade about  
18 that today, but you can see from the  
19 video camera that Nicole Wade is  
20 nowhere to be found. Because she is  
21 running and hiding from the truth, but  
22 the truth is going to catch up with her  
23 in due time.  
24 I have an impeccable Bar

25 record of 43 and a half, 44 years. I

19

1 have been attacked because I support  
2 vocally President Donald Trump. The  
3 lawyers that file claims regarding the  
4 fraudulent election of 2020 have all  
5 been persecuted by various grievance  
6 committees around the state, and that  
7 was all planned. I never violated a  
8 Bar rule. When I found out the Bar  
9 rule requiring consent from the client  
10 from my lawyers who did not tell me  
11 about it at the time, they should have,  
12 Alston & Bird, Joy Burby and Chris  
13 Marquardt, they malpracticed me. I did  
14 everything to adhere to the Bar rule.  
15 This lawsuit filed against me is  
16 frivolous.

17 I had the absolute right as  
18 the Plaintiff to take the sworn  
19 testimony of Nicole Wade to establish  
20 the truth. There is no legal right in  
21 Georgia to avoid being deposed simply  
22 because you filed a Motion for  
23 Protective Order. You have got to get  
24 a ruling from the Court. The Court

25 didn't rule, which is obligated under

20

1 the law of Georgia to show up and be  
2 deposed. She is not here.

3 I didn't come here prepared to  
4 give a speech and there is a lot more  
5 that I can say and it would have been  
6 revealed by her testimony. So I have  
7 given you just a couple of the  
8 highlights on the record so that it's  
9 clear, I think, about why I have been  
10 subjected to this nonsense and  
11 fraudulent accusations themselves about  
12 Nicole Wade, Jonathan Grunberg and  
13 Taylor Wilson, and they don't have the  
14 courage to show up and testify under  
15 oath. He who has nothing to hide,  
16 hides nothing. They got a lot to hide.  
17 It would have come out today from  
18 Nicole Wade. She chose not to be here.

19 So we will be back tomorrow,  
20 we will ask for these people to show up  
21 and have G. Taylor Wilson's deposition  
22 taken pursuant to notice. Maybe he  
23 will be someone as a lawyer that would  
24 adhere to the law and show up, we will

25 see. If not, we will make a record.

21

1 There is a lot to know about G. Taylor  
2 Wilson.

3 Friday we have the deposition  
4 noticed properly of Jonathan D.  
5 Grunberg. Well, maybe Jonathan as a  
6 lawyer will show up according to law as  
7 he is required to do and he will be  
8 deposed. We got a lot to ask Jonathan  
9 Grunberg and we are entitled to know  
10 it.

11 Are we not?

12 MR. EXUM: We are.

13 MR. REYES: We are. Yes, sir.

14 MR. WOOD: You don't use the  
15 court system to extort people, you  
16 don't use the court system to file  
17 irrelevant, out of context, false  
18 accusations against another person like  
19 they did me. I will not tolerate it.

20 So that will conclude my on  
21 the record comments by simply saying  
22 that at the appropriate time, if Taylor  
23 Wilson who is trying to get into the  
24 Tennessee Bar, he is applying for

25 membership in the Tennessee Bar, the

22

1 State Bar of Tennessee, people are  
2 going to let them know about what G.  
3 Taylor Wilson did if he doesn't show up  
4 for a deposition. G. Taylor Wilson  
5 based on what I learned when they  
6 didn't give the client the records and  
7 then I learned that over a time period  
8 they had been surreptitiously recording  
9 me. Can you imagine somebody doing  
10 that to somebody they are doing  
11 business with, where they try to make  
12 you look bad knowing they are recording  
13 it and they don't give you the full  
14 context of the recording? Any lawyer  
15 that does that to another lawyer is not  
16 fit to practice law, not in the State  
17 of Georgia and not in the State of  
18 Tennessee. G. Taylor Wilson's  
19 application to the State Bar of  
20 Tennessee should be rejected. He is  
21 unfit. If anybody needs to be  
22 investigated by the Georgia Bar, it's  
23 Nicole J. Wade, Jonathan D. Grunberg  
24 and G. Taylor Wilson. And Andy Beal,

25 the lawyer that filed this lawsuit, he

23

1 should be disbarred for filing a  
2 frivolous lawsuit, and then publicizing  
3 it, getting a gag order against me that  
4 is on appeal that prohibited me from  
5 telling people the truth while the  
6 salacious, false accusations were being  
7 spread by him and his clients all over  
8 the country. Andy Beal's law firm  
9 Buckley Beal represented Ginger White  
10 in litigation for legal matters that I  
11 had with her on behalf of Herman Kane.  
12 They got a political agenda. There are  
13 sanctions available to the Court for  
14 lawyers that file frivolous lawsuits.  
15 Andy Beal needs to be sanctioned. The  
16 State Bar needs to investigate Andy  
17 Beal. The State Bar of Georgia urges  
18 all citizens now, don't have to be a  
19 client, don't have to live in Georgia,  
20 don't have to have any interaction with  
21 the lawyer in Georgia, but the State  
22 Bar of Georgia wants to hear from the  
23 people.  
24 If you think a lawyer is acted



25 inappropriately, for example, Sandy

24

1 Beal, write the State Bar of Georgia.  
2 If you think that Nicole Wade, and  
3 Jonathan Grunberg, and Taylor Wilson  
4 have acted unethically and unlawfully,  
5 write the State Bar of Georgia and file  
6 a Complaint. I am not asking you to do  
7 it, I am just advising you that the  
8 State Bar of Georgia wants you to do  
9 it, because we got to weed out these  
10 corrupt lawyers, we got to weed out the  
11 unethical lawyers, we got to weed out  
12 the people that abuse our system of law  
13 like these people are abusing it before  
14 you're very eyes today. Where is  
15 Nicole Wade? That chair is empty.  
16 Before this is over, she will be in  
17 that chair, her day will come, the  
18 truth will be revealed, every lie will  
19 be revealed.

20 That concludes my comments on  
21 the record at this time.

22 Ibrahim, do you have anything  
23 to add?

24 MR. REYES: No, sir. Thank

25 you.

25

1 MR. WOOD: All right. Well,  
2 the deposition is now suspended until  
3 we can get before the Court after we  
4 find out if Grunberg and Wilson are  
5 going to do their duties as lawyers and  
6 show up for their depositions, if not,  
7 we will address this with the Court and  
8 we will ask the Court to sanctions  
9 these people.

10 Mr. Reyes came here from  
11 Florida, I have got a summer associate  
12 here, I have got a court reporter here,  
13 I have got a videographer here in one  
14 of the most beautiful, secure buildings  
15 in Atlanta. They have no excuse. The  
16 Judge ought to strike their Complaint  
17 and give me attorneys' fees and  
18 expenses, and then trust me, I have got  
19 a claim against them for breach of  
20 contract. Because even if they had a  
21 fraud claim against me, which they  
22 don't, they released all their claims  
23 in the agreement, then they breached  
24 the agreement by suing me for fraud.

25 Their agreement they entered into with

26

1 me has been repudiated. It's void.

2 I got that about right,

3 Ibrahim?

4 MR. REYES: You did.

5 MR. WOOD: I don't care how

6 long it takes, I don't care how much

7 money I have to spend, I will not let

8 the injustice inflicted upon me and my

9 reputation by Nicole Wade, and Jonathan

10 Grunberg, and G. Taylor Wilson, and

11 Andy Beal of Buckley & Beal, I will not

12 let it stand.

13 That concludes the deposition

14 at this point in time and we will

15 adjourn it until the Court can rule on

16 it and we will be back tomorrow at 9

17 o'clock to see if G. Taylor Wilson who

18 is going to do his duty and follow the

19 law and show up for his testimony.

20 Thank you very much. Thank

21 you, madam reporter and thank you Mr.

22 Videographer.

23 VIDEO OPERATOR: The time is

24 9:48. We are going off record.

27

C E R T I F I C A T I O N

I HEREBY CERTIFY that the  
proceedings and evidence are contained  
fully and accurately in the  
stenographic notes taken by me upon the  
foregoing matter on Wednesday, June 16,  
2021, and that this is a correct  
transcript of same.

Celeste Perla, RPR, CSR, Merit  
Reporter and Notary Public  
Registered ID #19508  
CCR 6331-2589-3832-7040

(The foregoing certification of  
this transcript does not apply to any  
reproduction of the same by any means, unless  
under the direct control and/or supervision of  
the certifying reporter.)

25

28

1 DISCLOSURE

2 SUPERIOR COURT  
3 COUNTY OF FULTON  
4 DEPONENT: NICOLE WADE (NO SHOW)

5 Pursuant to Article 10.B of the  
6 Rules and Regulations of the Board of Court  
7 Reporting of the Judicial Council of Georgia, I  
8 make the following disclosure:

9 I am a Certified Court Reporter. I  
10 am here as an independent contractor to Huseby  
11 Litigation.

12 Huseby Litigation was contacted by  
13 counsel to provide court reporting services for  
14 this deposition. I am not disqualified for a  
15 relationship of interest under the provisions of  
16 O.C.G.A. 9-11-28(c). Huseby Litigation will not  
17 be taking this deposition under any contract that  
18 is prohibited by the O.C.G.A. 15-14-37(a) and  
19 (b).

20 Huseby Litigation has no  
21 contract/agreement to provide court reporting  
22 services with any party to the case, any counsel  
23 in the case or any reporter or reporting agency  
24 from whom a referral might have been made to  
cover this deposition. Huseby Litigation has  
charged its usual and customary rates to all  
parties in the case.

18 This date of Wednesday, June 16,  
19 2021.

20

21

22 Celeste Perla  
23 Certified Court Reporter  
24 Certificate #19508  
CCR 6331-2589-3832-7040

24



**NICOLE WADE, ET AL. vs L. LIN WOOD, ET AL.**  
**Taylor Wilson on 06/17/2021**

1                   IN THE SUPERIOR COURT OF FULTON COUNTY  
2                                   STATE OF GEORGIA

3   NICOLE WADE; JONATHAN                   §  
4   GRUNBERG; TAYLOR WILSON;               § CIVIL ACTION FILE NO.  
5   WADE, GRUNBERG & WILSON,               § 2020-CV-339937  
6   LLC,   §  
7   §  
8   §  
9   §  
10    §  
11    §  
12    §  
13    §  
14    §  
15    §  
16    §  
17    §  
18    §  
19    §  
20    §  
21    §  
22    §  
23    §  
24    §  
25    §

~~~~~

VIDEOTAPED CERTIFICATE OF NON-APPEARANCE OF  
TAYLOR WILSON

9:18 a.m.  
Thursday, the 17th day of June 2021

Suite 2300, One Atlantic Center  
1201 West Peachtree Street, NW  
Atlanta, Georgia

Blanche J. Dugas, CRR, RPR, CCR No. B-2290

**NICOLE WADE, ET AL. vs L. LIN WOOD, ET AL.**  
**Taylor Wilson on 06/17/2021**

Pages 2..5

| Page 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Page 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1 APPEARANCES OF COUNSEL</p> <p>2 On Behalf of the Plaintiffs:</p> <p>3 No appearance</p> <p>4 On Behalf of the Defendants:</p> <p>5 L. LIN WOOD, JR., Esquire</p> <p>6 L. Lin Wood, PC</p> <p>7 Post Office Box 52584</p> <p>8 Atlanta, Georgia 30355-0584</p> <p>9 (404) 891-1402</p> <p>10 (404) 506-9111 (facsimile)</p> <p>11 lwood@linwoodlaw.com</p> <p>12 IBRAHIM REYES, Esquire</p> <p>13 Reyes Lawyers, PA</p> <p>14 236 Valencia Avenue</p> <p>15 Coral Gables, Florida 33134</p> <p>16 (305) 445-0011</p> <p>17 (305) 445-1181 (facsimile)</p> <p>18 lreyes@reyeslawyers.com</p> <p>19 Also Present:</p> <p>20 A.J. Gallo, videographer</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>1 scheduled to begin at 9:00 a.m., and that</p> <p>2 the deponent did not appear.</p> <p>3 MR. WOOD, attorney for the Defendants,</p> <p>4 made a statement for the record as follows:</p> <p>5 MR. WOOD: So the date is June</p> <p>6 the 17th. It's 9:19 a.m. We are here</p> <p>7 today to take the deposition upon</p> <p>8 cross-examination of one of the plaintiffs</p> <p>9 and opposite party, Taylor -- G. Taylor</p> <p>10 Wilson.</p> <p>11 Mr. Wilson's deposition was duly</p> <p>12 noticed and served on May the 10th of this</p> <p>13 year. His counsel raised a concern that</p> <p>14 the place for the deposition, which was</p> <p>15 initially noticed for plaintiffs' counsel's</p> <p>16 office, was too small. So to accommodate</p> <p>17 that concern, an amended notice of</p> <p>18 deposition was duly filed and served on</p> <p>19 June the 2nd, and we're here today at One</p> <p>20 Atlantic Center on the 23rd floor, a very</p> <p>21 secure building in Midtown Atlanta,</p> <p>22 pursuant to the notices of depositions</p> <p>23 served upon Mr. Wilson.</p> <p>24 On Friday night, we've learned -- we</p> <p>25 learned at around 8:30 p.m. there was a</p>                                                                             |
| Page 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Page 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>1 Videotaped Certificate of Non-Appearance of</p> <p>2 Taylor Wilson</p> <p>3 June 17, 2021</p> <p>4 VIDEOGRAPHER: This will be Tape No. 1</p> <p>5 to the videotaped deposition of Taylor</p> <p>6 Wilson taken in the matter of Nicole Wade,</p> <p>7 et al. versus L. Lin Wood, et al. Today's</p> <p>8 deposition is being held on June 17th,</p> <p>9 2021, and the time is now 9:18 a.m.</p> <p>10 Will all counsel please introduce</p> <p>11 themselves for the record.</p> <p>12 MR. WOOD: Lin Wood. I am one of the</p> <p>13 defendants and I'm also co-counsel for</p> <p>14 myself and my professional corporation, L.</p> <p>15 Lin Wood, PC.</p> <p>16 MR. REYES: Ibrahim Reyes with Reyes</p> <p>17 Lawyers, PA on behalf of defendants. I am</p> <p>18 here from the state of Florida to attend</p> <p>19 these depositions.</p> <p>20 I, Blanche J. Dugas, Certified Court</p> <p>21 Reporter, do hereby certify that I was</p> <p>22 present at Suite 2300, 1201 West Peachtree</p> <p>23 Street, Atlanta, Georgia, on Thursday, the</p> <p>24 17th day of June 2021, for the purpose of</p> <p>25 reporting the deposition of TAYLOR WILSON,</p> | <p>1 motion for protective order filed with the</p> <p>2 Court. We did not know about that motion</p> <p>3 until Monday because the motion was filed</p> <p>4 at 8:30 p.m. and the Court's filing system</p> <p>5 serves the lawyers. So clearly plaintiffs'</p> <p>6 counsel, Mr. Wilson's counsel, knew that by</p> <p>7 filing at 8:30 p.m., that we would not</p> <p>8 learn about it until Monday, with the first</p> <p>9 deposition being noticed of Nicole Wade</p> <p>10 yesterday, on Wednesday.</p> <p>11 There was no effort to contact any</p> <p>12 counsel for the defendants to advise us</p> <p>13 that they were going to file the motion or</p> <p>14 contest the taking of the deposition. So</p> <p>15 having filed that, and we learned about it</p> <p>16 on Monday, we wrote the Court and put our</p> <p>17 position concerning the frivolity of the</p> <p>18 motion before the Court. The Court did not</p> <p>19 set an emergency hearing and took no action</p> <p>20 whatsoever.</p> <p>21 Georgia law is clear, can be found in</p> <p>22 the case of Rice versus Cannon, 283 Georgia</p> <p>23 Appeals 438, a 2007 decision, that merely</p> <p>24 filing a motion for protective order does</p> <p>25 not relieve the plaintiffs from the duty to</p> |



**NICOLE WADE, ET AL. vs L. LIN WOOD, ET AL.**  
**Taylor Wilson on 06/17/2021**

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <p style="text-align: right;"><b>Page 6</b></p> <p>1 appear at the plaintiffs' deposition. The</p> <p>2 Court went on to say even if the plaintiffs</p> <p>3 could have prevailed on motions to compel</p> <p>4 more complete responses to their discovery</p> <p>5 efforts, this did not excuse the plaintiffs</p> <p>6 from their duty to attend the plaintiffs'</p> <p>7 depositions, and in that case, the Court of</p> <p>8 Appeals affirmed that the motion for</p> <p>9 protective order itself provided no legal</p> <p>10 basis to relieve the plaintiffs from the</p> <p>11 duty to appear at their depositions. In</p> <p>12 that case, Rice versus Cannon, the trial</p> <p>13 court struck the plaintiffs' complaint for</p> <p>14 failure to show for the deposition.</p> <p>15 Now, Mr. Wilson has made a conscious</p> <p>16 and intentional decision not to appear</p> <p>17 today. We intend to file with the Court at</p> <p>18 the appropriate time after we confirm</p> <p>19 tomorrow whether Jonathan Grunberg is going</p> <p>20 to also fail to show up, a motion for</p> <p>21 sanctions, which will include not only a</p> <p>22 request for attorneys' fees and expenses --</p> <p>23 Mr. Reyes has traveled here from Florida,</p> <p>24 lost a lot of time from his other cases --</p> <p>25 but we intend to ask for attorneys' fees</p> | <p style="text-align: right;"><b>Page 8</b></p> <p>1 settlement agreement I believe of March</p> <p>2 the 17th of 2020. Yet the accusations that</p> <p>3 are contained -- the allegations contained</p> <p>4 in this 78 or '9-page complaint do not</p> <p>5 address any issue regarding fraud in the</p> <p>6 inducement under Georgia law. I wanted to</p> <p>7 ask Mr. Wilson today if he understood what</p> <p>8 fraud in the inducement meant under Georgia</p> <p>9 law.</p> <p>10 There are allegations in the</p> <p>11 complaint, for example, that I committed an</p> <p>12 assault and battery on Jonathan Grunberg in</p> <p>13 October of 2019. I dispute that</p> <p>14 accusation.</p> <p>15 There are also accusations that I</p> <p>16 committed an assault when Mr. Taylor,</p> <p>17 unannounced, came into my home, and I</p> <p>18 pushed his chest and said, "What are you</p> <p>19 doing here?" I had no idea he was coming.</p> <p>20 He just burst in the front door. That, I</p> <p>21 believe, was in February of 2020.</p> <p>22 What do those, I contend, false</p> <p>23 accusations have to do with fraud? They</p> <p>24 certainly have nothing to do with breach of</p> <p>25 contract. They were included just to smear</p>                                                                       |
| <p style="text-align: right;"><b>Page 7</b></p> <p>1 and expenses, and also for the Court to</p> <p>2 sanction the plaintiffs by striking their</p> <p>3 complaint.</p> <p>4 This lawsuit was filed under very</p> <p>5 suspicious circumstances. While there was</p> <p>6 a bona fide disagreement on the question of</p> <p>7 client consent to a shared fee, when that</p> <p>8 issue arose, the plaintiffs, instead of</p> <p>9 trying to discuss it, drafted and proposed</p> <p>10 to file a complaint against me and L. Lin</p> <p>11 Wood, PC. The complaint is literally 70 --</p> <p>12 77 or 78 pages -- 79 pages where they</p> <p>13 allege any number of salacious, false,</p> <p>14 out-of-context, immaterial, irrelevant</p> <p>15 allegations that were clearly designed not</p> <p>16 to address a breach of contract, but were</p> <p>17 designed to smear me in the public's mind.</p> <p>18 I wanted to ask Mr. Wilson why they</p> <p>19 included those accusations in their</p> <p>20 complaint since they have nothing to do</p> <p>21 with breach of contract.</p> <p>22 They did threaten to file the</p> <p>23 complaint also on fraud in the inducement</p> <p>24 claim claiming that somehow they had been</p> <p>25 fraudulently induced into signing the</p>                                                                            | <p style="text-align: right;"><b>Page 9</b></p> <p>1 me. I wanted to ask Mr. Wilson today under</p> <p>2 cross-examination about those incidents. I</p> <p>3 wanted to talk to him about who is</p> <p>4 financing his lawsuit; find out whether or</p> <p>5 not someone is paying them to pursue this</p> <p>6 case against me. I'm entitled to know how</p> <p>7 much they've paid. I'm entitled to know</p> <p>8 how much they are owed -- or owe to their</p> <p>9 lawyers. I'm entitled to know whether any</p> <p>10 third party has made any types of payments</p> <p>11 to their lawyers on their behalf or to</p> <p>12 them. Those are relevant questions allowed</p> <p>13 by law. Mr. Wilson should have been here</p> <p>14 today to answer those questions.</p> <p>15 I also wanted to ask him about whether</p> <p>16 he's had any conversations himself or</p> <p>17 through counsel with Chris Steinmetz or</p> <p>18 anyone connected with the State Bar of</p> <p>19 Georgia, in particular the State Bar of</p> <p>20 Georgia grievance committee.</p> <p>21 The grievance committee of the State</p> <p>22 Bar brought a charge against me alleging</p> <p>23 that I had somehow breached my professional</p> <p>24 obligations by filing a couple of lawsuits</p> <p>25 in Georgia regarding the election of</p> |

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| <b>Page 10</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Page 12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>1 November 2020 and the senate runoff of</p> <p>2 January of 2021. In one of the cases, I</p> <p>3 was the plaintiff. I had another law firm</p> <p>4 that prepared and filed it. Interestingly</p> <p>5 that law firm did not get disciplined or</p> <p>6 any grievance filed.</p> <p>7 Those lawsuits were affirmed as being</p> <p>8 legally correct by Justice Clarence Thomas</p> <p>9 when he dissented to the failure of the</p> <p>10 Court to grant certiorari review, the</p> <p>11 Supreme Court, on a number of election</p> <p>12 cases, including the case I filed in</p> <p>13 Georgia.</p> <p>14 There were other cases where I signed</p> <p>15 on as co-counsel with Sidney Powell at her</p> <p>16 request in case she needed a trial lawyer.</p> <p>17 I had no active participation in the</p> <p>18 drafting of the other lawsuits. I did make</p> <p>19 one brief appearance before Judge Timothy</p> <p>20 Batten at her request where he agreed with</p> <p>21 what my argument was.</p> <p>22 So I've got the State Bar of Georgia</p> <p>23 coming after me for filing legitimate</p> <p>24 lawsuits. They were dismissed on issues</p> <p>25 relating to standing, but there was never</p>                                      | <p>1 Wilson knows about the Bar's efforts. For</p> <p>2 example, I'd like to know did the Bar, in</p> <p>3 relying on his complaint, ever sit down and</p> <p>4 interview him? Who did the interview? How</p> <p>5 long did it take? What was said? Were</p> <p>6 there efforts to interview Nicole Wade?</p> <p>7 Were there efforts to interview Jonathan</p> <p>8 Grunberg, or did the State Bar just rely on</p> <p>9 the unproven, disputed accusations in the</p> <p>10 complaint that was filed?</p> <p>11 I'm curious to know that because I</p> <p>12 wanted to ask Mr. Wilson whether or not he</p> <p>13 was aware of a February 10th text message</p> <p>14 that his now partner, Nicole Wade, sent to</p> <p>15 me where she acknowledged that she knew</p> <p>16 that I was extremely upset over some</p> <p>17 problems with my children, and that she</p> <p>18 affirmed that I was mentally well, told me</p> <p>19 that no matter what happened, that she</p> <p>20 would always love me, and if I needed her,</p> <p>21 she'd always be there to help me just like</p> <p>22 I was always there to help Nicole and</p> <p>23 Jonathan and Mr. Wilson.</p> <p>24 I wanted to go into that with</p> <p>25 Mr. Wilson. How he came to work for my</p> |
| <b>Page 11</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Page 13</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>1 any finding that the lawsuits were</p> <p>2 frivolous. There were no efforts to file</p> <p>3 motions for any type of sanctions under</p> <p>4 Rule 11. So all of a sudden, that falls by</p> <p>5 the wayside, and the Bar is also trying to</p> <p>6 improperly regulate my free speech on my</p> <p>7 spare time when I comment on social media.</p> <p>8 And then they're relying on this</p> <p>9 lawsuit. In fact, it appears that the</p> <p>10 State Bar of Georgia's grievance against me</p> <p>11 now is based on the unproven, disputed</p> <p>12 accusations in Mr. Wilson's lawsuit. Now,</p> <p>13 that's nonsensical to me as a lawyer of</p> <p>14 44 years.</p> <p>15 Why would the State Bar of Georgia try</p> <p>16 to persecute me over disputed allegations</p> <p>17 in a civil dispute? My goodness, if they</p> <p>18 did that to every lawyer in the state of</p> <p>19 Georgia and started looking into their</p> <p>20 divorce complaints and the other types of</p> <p>21 actions filed against them, the State Bar</p> <p>22 of Georgia would find itself sitting as the</p> <p>23 judge and jury and executioner over</p> <p>24 people's civil disputes. It's nonsensical.</p> <p>25 I'd like to know what Mr. Taylor</p> | <p>1 firm and what I did for him, and how well</p> <p>2 he did under my supervision and how well he</p> <p>3 was compensated, but he's not here to</p> <p>4 answer those questions. I don't understand</p> <p>5 why not. You file a lawsuit, you ought to</p> <p>6 be willing to come in and discuss it. The</p> <p>7 law says you have an absolute duty to do</p> <p>8 so.</p> <p>9 One of the most important things I</p> <p>10 wanted to talk to Mr. Wilson about was the</p> <p>11 settlement agreement that the parties</p> <p>12 reached regarding fee sharing. I wanted to</p> <p>13 talk to Mr. Wilson about his knowledge or</p> <p>14 his lawyer's information to him regarding</p> <p>15 Rule 1.5 of the State Bar of Georgia where</p> <p>16 you're required to get client consent</p> <p>17 before you can share a fee with an outside</p> <p>18 law firm.</p> <p>19 I wanted to ask him about his outside</p> <p>20 law firm. I know that he has G. Taylor</p> <p>21 Wilson, PC. I wanted to talk to him about</p> <p>22 when that was formed, why. I know that he</p> <p>23 also is a member of Grunberg &amp; Wilson, PC.</p> <p>24 I wanted to talk to him about why that was</p> <p>25 formed, when. I know it was formed a</p>                     |

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| <b>Page 14</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Page 16</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>1 couple of years ago because I always shared</p> <p>2 a fee with him. I paid his PC, Grunberg &amp;</p> <p>3 Wilson, PC. I wanted to talk to him about</p> <p>4 when they formed Wade, Grunberg &amp; Wilson,</p> <p>5 LLC. It looks like they formed it in 2018.</p> <p>6 I didn't know anything about it.</p> <p>7 I wanted to ask him a lot of questions</p> <p>8 about his professional corporations and his</p> <p>9 knowledge of the other lawyers who have</p> <p>10 sued me, their professional corporations.</p> <p>11 I wanted to talk to him about the fact that</p> <p>12 he's never had any type of a partnership</p> <p>13 agreement with L. Lin Wood, PC in writing.</p> <p>14 He's never been privy to nor would he have</p> <p>15 been allowed to see any profit and loss</p> <p>16 statements of L. Lin Wood, PC.</p> <p>17 There are a lot of allegations that</p> <p>18 he's making in his complaint that don't</p> <p>19 make sense, they are not factually</p> <p>20 supported, and many of them are just plain</p> <p>21 false. I wanted to ask him about those</p> <p>22 today, and I'm entitled to do it.</p> <p>23 I wanted to ask him about this part of</p> <p>24 the settlement agreement where he say s</p> <p>25 very clearly, and I think the State Bar of</p> | <p>1 lawyer she's ever worked with and seen in</p> <p>2 action. I suspect ol' young Taylor Wilson</p> <p>3 would say the same thing, but he didn't</p> <p>4 want to show up and admit the truth today.</p> <p>5 I wanted to find out what potential</p> <p>6 involvement there may be in this lawsuit</p> <p>7 with Black Lives Matter, BLM, because</p> <p>8 Jonathan Grunberg is a public supporter of</p> <p>9 BLM. I support Donald Trump. I know that</p> <p>10 Jonathan Grunberg's political position is</p> <p>11 such that I think it would be fair to</p> <p>12 say -- and we could ask him tomorrow if he</p> <p>13 shows up -- he has a very deep and</p> <p>14 longstanding dislike for President Trump</p> <p>15 politically.</p> <p>16 Jonathan used to correct me when we'd</p> <p>17 kid him and say he was a -- from Chile. He</p> <p>18 said, "No, I'm from Chile," and then he'd</p> <p>19 say, "I'm a Chilean Jew."</p> <p>20 Jonathan is Jewish. I've known that</p> <p>21 since he started working for me. I knew</p> <p>22 that when he fell off of a rock-climbing</p> <p>23 wall 40 feet and crushed his feet and for</p> <p>24 one year couldn't come to work, and I paid</p> <p>25 him every dime under the agreement. I</p>   |
| <b>Page 15</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Page 17</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>1 Georgia needs to understand this, "The</p> <p>2 parties further agree that upon information</p> <p>3 and belief, each party to this agreement is</p> <p>4 mentally and physically competent in all</p> <p>5 respects." I was a party to that</p> <p>6 agreement. That agreement is dated March</p> <p>7 the 17th of 2020.</p> <p>8 Now, the State Bar of Georgia made a</p> <p>9 request -- I think they've withdrawn it</p> <p>10 now -- to have me undergo a mental health</p> <p>11 exam; wouldn't tell me why they wanted to</p> <p>12 do it, the basis for it. They wouldn't</p> <p>13 even tell me who it was, and we filed a</p> <p>14 lawsuit about that that's now on appeal.</p> <p>15 But if the State Bar of Georgia is</p> <p>16 relying on the Wade, Grunberg &amp; Wilson</p> <p>17 complaint against me, then Taylor Wilson</p> <p>18 and Nicole Wade and Jonathan Grunberg will</p> <p>19 be the first to testify that I was mentally</p> <p>20 competent in all respects. What's going on</p> <p>21 here?</p> <p>22 Nicole Wade, back in February, in her</p> <p>23 text message, said the same thing. Nicole</p> <p>24 Wade, if she had testified yesterday, would</p> <p>25 have told you that I was probably the best</p>                                                | <p>1 never let that boy go a day without getting</p> <p>2 paid; even gave him a \$200,000 bonus in a</p> <p>3 case he didn't work on to pay off his</p> <p>4 student loans. I tried to help Jonathan</p> <p>5 Grunberg. I tried to help Mr. Wilson too.</p> <p>6 We were going to talk about that today at</p> <p>7 length.</p> <p>8 And then, all of a sudden, when we'd</p> <p>9 kid Jonathan in the office -- Taylor was</p> <p>10 present -- we'd say, "Well, Jonathan,</p> <p>11 you're just a Chilean Jew." He'd laugh.</p> <p>12 We'd all laugh. Now they filed a lawsuit</p> <p>13 and tried to tell me that I'm an</p> <p>14 anti-Semite. These people have no shame.</p> <p>15 Their greed and their desire for whatever</p> <p>16 reasons to try to destroy my reputation is</p> <p>17 hard to describe how someone could do that</p> <p>18 type of -- those types of things to</p> <p>19 somebody that has been so good to them.</p> <p>20 But I wanted to talk to Mr. Wilson</p> <p>21 about that today. I wanted to talk to</p> <p>22 Mr. Wilson about his involvement with my</p> <p>23 son, Matt Wood, my daughter, Chandler Wood,</p> <p>24 and to whether he talked to my other</p> <p>25 children. Because I told these gentlemen,</p> |

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| <p style="text-align: right;"><b>Page 18</b></p> <p>1 including Mr. Wilson, that they were<br/> 2 interfering with my children's relationship<br/> 3 with their father and contributing to my<br/> 4 children violating one of God's Ten<br/> 5 Commandments to honor thy father. When<br/> 6 Mr. Wilson did that repeatedly, you'll see<br/> 7 from some of the things I said to him that<br/> 8 had been taken out of context that I was<br/> 9 hot-blooded. You don't mess with me and my<br/> 10 children. Mr. Wilson did. I wanted to ask<br/> 11 him about that today in detail, but he's<br/> 12 not here.</p> <p>13 Now, the State Bar of Georgia wanted<br/> 14 to see these depositions before the end of<br/> 15 June to consider them in their July meeting<br/> 16 as to what to do with their frivolous<br/> 17 grievance complaint filed against me. I<br/> 18 don't know whether there's a strategy here<br/> 19 to avoid being deposed so that the Bar will<br/> 20 not see the truth. Seems to me now the Bar<br/> 21 has to, in fairness, delay its report until<br/> 22 I can get these depositions, if I ever do,<br/> 23 because I believe the judge ought to strike<br/> 24 this lawsuit. So we'll see what the Court<br/> 25 does.</p>         | <p style="text-align: right;"><b>Page 20</b></p> <p>1 his lawsuit has no merit whatsoever, and<br/> 2 how is the State Bar of Georgia going to<br/> 3 rely on any part of it when it's not even<br/> 4 going to be upheld if I can ever get a<br/> 5 Court -- the Court of Appeals to rule<br/> 6 fairly on the matter.</p> <p>7 So I'm a little frustrated. You get<br/> 8 sued for this money -- and it was really<br/> 9 interesting, by the way, to make the<br/> 10 record, I wanted to ask Mr. Taylor why they<br/> 11 told me instead of paying them some<br/> 12 \$600,000, that they wanted to now have me<br/> 13 pay them \$1.5 million, and if I didn't,<br/> 14 they were going to file this lawsuit they<br/> 15 sent to me to try to smear my name. They<br/> 16 were trying to extort me. Almost blackmail<br/> 17 me. \$1.5 million? How did the value of<br/> 18 the case go up three times? I told them to<br/> 19 file it. They did.</p> <p>20 The law does not sanction lawyers'<br/> 21 engaging in such conduct to try to extort<br/> 22 money from another party based on threats<br/> 23 of filing frivolous and smears in a<br/> 24 lawsuit. It shouldn't be tolerated.<br/> 25 The State Bar of Georgia does need to</p>                                                   |
| <p style="text-align: right;"><b>Page 19</b></p> <p>1 In any event, there's more going on<br/> 2 here than meets the eye, and I think that<br/> 3 not only do I have an absolute right as a<br/> 4 litigant to know the full truth on all<br/> 5 relevant issues, but since this lawsuit has<br/> 6 been made so public and used against me<br/> 7 around the nation, I think the public has a<br/> 8 right to know because apparently these<br/> 9 lawyers tried to convict me as guilty in<br/> 10 the court of public opinion based on their<br/> 11 accusations, disputed and unproven. They<br/> 12 apparently didn't learn anything from<br/> 13 working with me over the years, in terms of<br/> 14 defamation law.</p> <p>15 At any rate, I know that they sued me<br/> 16 for a claim that was released. If there<br/> 17 was a fraud claim -- which there's not --<br/> 18 it was released. They breached the<br/> 19 contract by doing so. The settlement<br/> 20 agreement that we've entered into is now<br/> 21 void. It's been rescinded. For that and<br/> 22 other reasons, it's been repudiated.</p> <p>23 So Mr. Wilson, I wanted to let him<br/> 24 know, in terms of the questioning today,<br/> 25 how he's going to deal with the fact that</p> | <p style="text-align: right;"><b>Page 21</b></p> <p>1 know what's happened in this litigation<br/> 2 because the State Bar of Georgia, I know,<br/> 3 has a number of grievance complaints filed,<br/> 4 including one that I filed because they<br/> 5 failed to give the client his time records<br/> 6 that he was entitled to see, and then when<br/> 7 they refused to give them to him, then they<br/> 8 claim that I breached the contract. I was<br/> 9 following the Bar rule. They broke -- they<br/> 10 breached it, didn't show up for a<br/> 11 deposition, possible extortion.</p> <p>12 I think the State Bar of Georgia needs<br/> 13 to know what's going on in this litigation,<br/> 14 not to prosecute me or discipline me. I<br/> 15 think that should be dismissed, should have<br/> 16 never been brought. I think they need to<br/> 17 discipline G. Taylor Wilson, Nicole Wade<br/> 18 and Jonathan Grunberg because this type of<br/> 19 conduct is well beneath the professional<br/> 20 standards of a lawyer or a party litigant.<br/> 21 Shouldn't be tolerated in our society or in<br/> 22 our legal system.</p> <p>23 Well, I've gone on a little bit longer<br/> 24 than I meant to, Ibrahim, but there's so<br/> 25 many questions that I have for Mr. Wilson,</p> |

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| <b>Page 22</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Page 24</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>1 just like we had for Nicole Wade, just like</p> <p>2 we have for Jonathan Grunberg, that it's</p> <p>3 frustrating to be falsely accused and then</p> <p>4 to have the accusers run and hide and</p> <p>5 violate the law and not show up to be</p> <p>6 confronted with the truth and</p> <p>7 cross-examined to show that their lawsuit</p> <p>8 was frivolous and that they are, in fact,</p> <p>9 the ones liable to me for money damages. I</p> <p>10 don't owe them a dime.</p> <p>11 Do you want to add anything in,</p> <p>12 Ibrahim?</p> <p>13 MR. REYES: Very little. I am</p> <p>14 disillusioned and appalled by what these</p> <p>15 lawyers have done, including their counsel,</p> <p>16 Andy Beal. This is not the way that law is</p> <p>17 practiced. These plaintiffs sued Mr. Wood,</p> <p>18 and today and yesterday and tomorrow is the</p> <p>19 opportunity that we have to depose these</p> <p>20 witnesses. They are plaintiffs in a case</p> <p>21 and they have chosen not to testify.</p> <p>22 It is frustrating, and we will raise</p> <p>23 it with the Court. This case must be</p> <p>24 dismissed with prejudice. Thank you.</p> <p>25 MR. WOOD: Well, I guess that will</p> | <p>1 (Deposition suspended at 9:44 a.m.)</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Page 23</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Page 25</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>1 conclude, to the extent we're not ending</p> <p>2 the deposition, but we are concluding this</p> <p>3 portion of it because we would obviously</p> <p>4 suspend it at this point depending on the</p> <p>5 Court's ruling. The Court, we believe,</p> <p>6 will either dismiss their complaint or,</p> <p>7 after they pay us significant attorneys'</p> <p>8 fees and expenses, he may require them to</p> <p>9 complete the deposition, which they should</p> <p>10 do.</p> <p>11 So at this point in time, the</p> <p>12 deposition is suspended subject to further</p> <p>13 ruling by Court. Thank you very much.</p> <p>14 Thank you, Madam Reporter. It's good</p> <p>15 to see you again. And thank you,</p> <p>16 Mr. Videographer. Good to see you again.</p> <p>17 We'll see y'all again tomorrow to see if</p> <p>18 Jonathan Grunberg wants to obey the law or</p> <p>19 whether he wants to violate the law and not</p> <p>20 show up himself.</p> <p>21 MR. REYES: And we'll get a</p> <p>22 certificate of non-appearance, and thank</p> <p>23 you.</p> <p>24 VIDEOGRAPHER: The time is 9:44.</p> <p>25 We're going off the record.</p>                                                          | <p>1 DISCLOSURE</p> <p>2</p> <p>3 Pursuant to Article 10.B of the Rules</p> <p>4 and Regulations of the Board of Court</p> <p>5 Reporting of the Judicial Council of</p> <p>6 Georgia which states: "Each court reporter</p> <p>7 shall tender a disclosure form at the time</p> <p>8 of the taking of the deposition stating the</p> <p>9 arrangements made for the reporting</p> <p>10 services of the certified court reporter,</p> <p>11 by the certified court reporter, the court</p> <p>12 reporter's employer or the referral source</p> <p>13 for the deposition, with any party to the</p> <p>14 litigation, counsel to the parties, or</p> <p>15 other entity. Such form shall be attached</p> <p>16 to the deposition transcript," I make the</p> <p>17 following disclosure:</p> <p>18</p> <p>19 I am a Georgia Certified Court</p> <p>20 Reporter. I am here as a representative of</p> <p>21 Huseby Global Litigation. Huseby Global</p> <p>22 Litigation was contacted to provide court</p> <p>23 reporting services for the deposition.</p> <p>24 Huseby Global Litigation will not be taking</p> <p>25 this deposition under any contract that is</p> <p>prohibited by O.C.G.A. 9-11-28(c).</p> <p>Huseby Global Litigation has no</p> <p>contract/agreement to provide reporting</p> <p>services with any party to the case, any</p> <p>counsel in the case, or any reporter or</p> <p>reporting agency from whom a referral might</p> <p>have been made to cover this deposition.</p> <p>Huseby Global Litigation will charge</p> <p>its usual and customary rates to all</p> <p>parties in the case, and a financial</p> <p>discount will not be given to any party to</p> <p>this litigation.</p> <p align="right"><i>Blanche J. Dugas</i></p> <p align="right">Blanche J. Dugas<br/>CCR No. B-2290</p> |

**NICOLE WADE, ET AL. vs L. LIN WOOD, ET AL.**  
**Taylor Wilson on 06/17/2021****Page 26**

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1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3

4 I hereby certify that the foregoing  
5 transcript was reported, as stated in the  
6 caption, and the questions and answers  
7 thereto were reduced to typewriting under  
8 my direction; that the foregoing pages  
9 represent a true, complete, and correct  
10 transcript of the evidence given upon said  
11 hearing, and I further certify that I am  
12 not of kin or counsel to the parties in the  
13 case; am not in the employ of counsel for  
14 any of said parties; nor am I in any way  
15 interested in the result of said case.

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25



BLANCHE J. DUGAS, CCR-B-2290

**NICOLE WADE, ET AL. vs L. LIN WOOD, ET AL.**

**Taylor Wilson on 06/17/2021**

**Index: working..young**

**working**

16:21

19:13

**writing**

14:13

**wrote** 5:16

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**y'all** 23:17

**year** 4:13

16:24

**years** 11:14

14:1 19:13

**yesterday**

5:10 15:24

22:18

**young** 16:2

**NICOLE WADE vs L. LIN WOOD, ET AL.**  
**Jonathan Grunberg on 06/18/2021**

1                   IN THE SUPERIOR COURT OF FULTON COUNTY  
2                                   STATE OF GEORGIA

3   NICOLE WADE; JONATHAN           §  
4   GRUNBERG; TAYLOR WILSON;       § CIVIL ACTION FILE NO.  
5   WADE, GRUNBERG & WILSON,       § 2020-CV-339937  
6   LLC,                               §  
7                                   §  
8                                   §  
9                                   §  
10                                  §  
11                                  §  
12                                  §  
13                                  §  
14                                  §  
15                                  §  
16                                  §  
17                                  §  
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20                                  §  
21                                  §  
22                                  §  
23                                  §  
24                                  §  
25                                  §

3   NICOLE WADE; JONATHAN           §  
4   GRUNBERG; TAYLOR WILSON;       § CIVIL ACTION FILE NO.  
5   WADE, GRUNBERG & WILSON,       § 2020-CV-339937  
6   LLC,                               §  
7                                   §  
8                                   §  
9                                   §  
10                                  §  
11                                  §  
12                                  §  
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14                                  §  
15                                  §  
16                                  §  
17                                  §  
18                                  §  
19                                  §  
20                                  §  
21                                  §  
22                                  §  
23                                  §  
24                                  §  
25                                  §

6                   Plaintiffs,

7                   vs.

9   L. LIN WOOD and L. LIN  
10   WOOD, PC,

11                   Defendants.

12   ~~~~~

13                   VIDEOTAPED CERTIFICATE OF NON-APPEARANCE OF  
14                                   JONATHAN GRUNBERG

15                                   9:18 a.m.  
16                   Friday, the 18th day of June 2021

17                                   Suite 2300, One Atlantic Center  
18                                   1201 West Peachtree Street, NW  
19                                   Atlanta, Georgia

21                   Blanche J. Dugas, CRR, RPR, CCR No. B-2290



**NICOLE WADE vs L. LIN WOOD, ET AL.**  
**Jonathan Grunberg on 06/18/2021**

**Pages 2..5**

| Page 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Page 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1 APPEARANCES OF COUNSEL</p> <p>2 On Behalf of the Plaintiffs:</p> <p>3 (No Appearance)</p> <p>4 On Behalf of the Defendants:</p> <p>5 L. LIN WOOD, JR., Esquire</p> <p>6 L. Lin Wood, PC</p> <p>7 Post Office Box 52584</p> <p>8 Atlanta, Georgia 30355-0584</p> <p>9 (404) 891-1402</p> <p>10 (404) 506-9111 (facsimile)</p> <p>11 lwood@linwoodlaw.com</p> <p>12</p> <p>13 IBRAHIM REYES, Esquire</p> <p>14 Reyes Lawyers, PA</p> <p>15 236 Valencia Avenue</p> <p>16 Coral Gables, Florida 33134</p> <p>17 (305) 445-0011</p> <p>18 (305) 445-1181 (facsimile)</p> <p>19 lreyes@reyeslawyers.com</p> <p>20</p> <p>21 Also Present:</p> <p>22 A.J. Gallo, videographer</p> <p>23 John Exum</p> <p>24</p> <p>25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>1 MR. REYES: Good morning. My name is</p> <p>2 Ibrahim Reyes with Reyes Lawyers. I am</p> <p>3 co-counsel for the defendants.</p> <p>4 MR. EXUM: Good morning. My name is</p> <p>5 John Exum. I am a summer associate at L.</p> <p>6 Lin Wood, PC.</p> <p>7 MR. WOOD: Let the record reflect that</p> <p>8 counsel for defendants are present here</p> <p>9 today at the location identified in a</p> <p>10 notice of deposition filed in this case for</p> <p>11 the deposition of Jonathan D. Grunberg, a</p> <p>12 plaintiff. The original deposition notice</p> <p>13 was filed and duly served on May the 10th.</p> <p>14 The lawyer for plaintiffs, including</p> <p>15 the lawyer for Mr. Grunberg, Andy Beal of</p> <p>16 Buckley Beal in Atlanta, Georgia, raised a</p> <p>17 concern about the fact that his office,</p> <p>18 which was the location of the original</p> <p>19 deposition notice, was too small. So to</p> <p>20 accommodate his concern, we arranged to</p> <p>21 have the deposition taken here at One</p> <p>22 Atlantic Center, one of the premier office</p> <p>23 buildings in Atlanta, an office building</p> <p>24 where Nicole Wade worked for probably</p> <p>25 20 years. It's got great security, a large</p> |
| Page 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Page 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p>1 Videotaped Certificate of Non-Appearance of</p> <p>2 Jonathan Grunberg</p> <p>3 June 18, 2021</p> <p>4 I, Blanche J. Dugas, Certified Court</p> <p>5 Reporter, do hereby certify that I was</p> <p>6 present at Suite 2300, 1201 West Peachtree</p> <p>7 Street, NW, Atlanta, Georgia, on Friday,</p> <p>8 the 18th day of June 2021, for the purpose</p> <p>9 of reporting the deposition of JONATHAN</p> <p>10 GRUNBERG, scheduled to begin at 9:00 a.m.,</p> <p>11 and that the deponent did not appear.</p> <p>12 VIDEOGRAPHER: This will be Tape No. 1</p> <p>13 to the videotaped deposition of Jonathan</p> <p>14 Grunberg taken in the matter of Nicole</p> <p>15 Wade, et al. versus L. Lin Wood, et al.</p> <p>16 Today's deposition is being held on</p> <p>17 June 18, 2021, and the time is now</p> <p>18 9:18 a.m.</p> <p>19 Will all counsel please introduce</p> <p>20 themselves for the record.</p> <p>21 MR. WOOD: My name is Lin Wood. I am</p> <p>22 co-counsel for the defendants, that</p> <p>23 includes myself as a defendant, and my</p> <p>24 professional corporation, L. Lin Wood, PC,</p> <p>25 which was formed in -- good gracious --</p> <p>September of 1997.</p> | <p>1 conference room. We changed the location</p> <p>2 to accommodate Mr. Grunberg and his lawyer,</p> <p>3 and we filed an amended notice on June</p> <p>4 the 2nd of this year.</p> <p>5 Last Friday night, we learned on</p> <p>6 Monday, the 14th, that Mr. Grunberg's</p> <p>7 lawyer, Andy Beal, filed a motion for</p> <p>8 protective order claiming that his clients</p> <p>9 had received some -- they called them</p> <p>10 threatening social media messages from</p> <p>11 unidentified individuals, and that they</p> <p>12 also felt that the location was not safe or</p> <p>13 secure. That's nonsense.</p> <p>14 We learned about it on Monday.</p> <p>15 Mr. Beal sought to have the Court hear the</p> <p>16 motion. We filed a response, pointed out</p> <p>17 that it was frivolous. The judge declined</p> <p>18 to hear the motion. Under Georgia law, in</p> <p>19 a case that I cited yesterday in the</p> <p>20 deposition of Taylor Wilson, an individual</p> <p>21 party is not allowed to file a motion for</p> <p>22 protective order and use that as an excuse</p> <p>23 to avoid the deposition unless that</p> <p>24 individual or party has obtained a court</p> <p>25 order relieving him or her of the</p>         |

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1 obligation to appear. No such court order  
2 was entered in this case.

3 Jonathan D. Grunberg is a lawyer in  
4 the state of Georgia. He knows the law.  
5 He defied the law today by knowingly and  
6 intentionally refusing to appear for his  
7 deposition. Under Rice versus Cannon, 283  
8 Georgia Court of Appeals 438, a 2007  
9 decision, the Georgia Court of Appeals  
10 affirmed the dismissal of a plaintiff's  
11 complaint for failing to show up for a  
12 deposition even though that person had  
13 filed a motion for protective order which  
14 had not been granted, and then unilaterally  
15 decided not to show up. The Court entered  
16 sanctions, which in that case included the  
17 dismissal of the complaint.

18 On Monday or Tuesday of next week, now  
19 that we have had three plaintiffs -- Nicole  
20 J. Wade, G. Taylor Wilson, and Jonathan D.  
21 Grunberg -- defy the law and the notice  
22 which has the legal equivalency of a  
23 subpoena, we intend to move for sanctions,  
24 including attorneys' fees, costs and also a  
25 dismissal and striking of the plaintiffs'

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1 complaint in this action. We have a number  
2 of other grounds pending before the Court  
3 to justify legally the dismissal of this  
4 complaint filed against me and my law firm.

5 So we're entitled and have an  
6 obligation to make a record so that the  
7 Court will have some indications of what we  
8 have been deprived of in not having  
9 Mr. Grunberg sit here under oath upon  
10 cross-examination and be forced to tell the  
11 truth or to be confronted with the truth in  
12 the event he decided to lie under oath and  
13 commit perjury.

14 Mr. Grunberg sued me, along with his  
15 two partners in the law firm of Wade,  
16 Grunberg & Wilson, LLC in Atlanta, Georgia.  
17 They have a website at www.wg -- excuse  
18 me -- wjwlawfirm.com. It's  
19 www.wjwlawfirm.com [sic]. I wanted to ask  
20 Mr. Grunberg when that professional  
21 corporation, Wade, Grunberg & Wilson, LLC,  
22 when it was formed. I wanted to ask him --  
23 because it shows an address of 1629 Monroe  
24 Drive, Northeast, Atlanta, Georgia 30324, I  
25 wanted to ask Mr. Grunberg when he or his

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1 law partners at Wade, Grunberg & Wilson  
2 signed a lease for that space. That date,  
3 I believe, is relevant to the issues in the  
4 case.

5 I wanted to ask Mr. Grunberg about his  
6 knowledge of the Georgia Professional Rules  
7 of Conduct. I wanted to ask him how many  
8 individuals have filed bar complaints  
9 against him with the State Bar of Georgia  
10 because of their belief that Mr. Grunberg  
11 has engaged in unethical and possibly even  
12 unlawful conduct as a lawyer in the state  
13 of Georgia.

14 I wanted to ask Mr. Grunberg about his  
15 knowledge of the Georgia Professional Rules  
16 of Conduct as it relates to  
17 misrepresentations and falsehood --  
18 falsehoods posted on a lawyer's website. I  
19 wanted to ask him, looking at his website  
20 where it describes his alleged experience,  
21 that he says he's represented individuals  
22 and companies in high-profile defamation  
23 matters across the country, including  
24 against large media companies such as CNN.  
25 I'm only aware of Mr. Grunberg being an

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1 assistant to me in cases that I filed for  
2 my clients against CNN. He says CBS he  
3 represented cases against. Well, I'm only  
4 aware of two cases where Jonathan was an  
5 assistant working under my supervision in a  
6 case filed against CBS for Burke Ramsey, my  
7 client, and the case filed by [REDACTED]  
8 [REDACTED], also my client.

9 I wanted to ask Jonathan about his  
10 claim that he sued Viacom. I'm only aware  
11 of one case where Jonathan Grunberg ever  
12 had a -- any involvement against Viacom,  
13 and that was on behalf of my client, Perri  
14 Reid, in a lawsuit that was filed against  
15 Viacom for defamation.

16 He also claims that he had represented  
17 people in large media companies where he  
18 filed -- against the Washington Post and  
19 NBC Universal. Well, that's news to me.  
20 I'm only aware of Jonathan Grunberg playing  
21 a minor role in my lawsuit filed against  
22 the Washington Post for my client, [REDACTED]  
23 [REDACTED], and my lawsuit filed against NBC  
24 Universal on behalf of my client, [REDACTED]  
25 [REDACTED]. I wanted to ask Jonathan whether

**NICOLE WADE vs L. LIN WOOD, ET AL.**  
**Jonathan Grunberg on 06/18/2021**

**Pages 10..13**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Page 10</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Page 12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>1 or not he was misrepresenting to the public</p> <p>2 his experience as a lawyer to try to lure</p> <p>3 people into his law firm under false</p> <p>4 pretenses.</p> <p>5 Jonathan says on his website he serves</p> <p>6 as more than an attorney; he's often a</p> <p>7 crisis manager. Wow. I'd like to ask him</p> <p>8 about his experience as a crisis manager.</p> <p>9 I never heard of him doing anything like</p> <p>10 that, and I know Jonathan Grunberg.</p> <p>11 I wanted to establish the history of</p> <p>12 Jonathan Grunberg. He was a law clerk for</p> <p>13 a federal judge, Jones, here in Atlanta,</p> <p>14 and he was hired initially as an associate</p> <p>15 by a law firm that I had established in</p> <p>16 2011, Wood, Hernacki &amp; Evans, LLC, after I</p> <p>17 had left Bryan Cave to take on a case</p> <p>18 against DaVita for two whistleblowers, a</p> <p>19 case that Bryan Cave had turned down. I</p> <p>20 believed in the whistleblowers, and I left</p> <p>21 my practice at Bryan Cave in order to fight</p> <p>22 for them against DaVita in a False Claims</p> <p>23 Act case.</p> <p>24 At the time that Wood, Hernacki &amp;</p> <p>25 Evans dissolved in 2014, I wanted to ask</p>                     | <p>1 regarding the Georgia anti-SLAPP statute</p> <p>2 not being applicable in federal court was</p> <p>3 held to be a correct theory. Jonathan</p> <p>4 helped write the brief. Looks like</p> <p>5 Jonathan is taking full credit for that.</p> <p>6 That's a lie. I wanted to ask him about</p> <p>7 that. He's not here.</p> <p>8 And then here's a doozy. I wanted to</p> <p>9 ask him about this. He says he has helped</p> <p>10 victims and their families recover millions</p> <p>11 of dollars. I think if he testified</p> <p>12 truthfully, he would say that he helped me</p> <p>13 in my efforts for my clients to recover</p> <p>14 millions of dollars. I don't think</p> <p>15 Jonathan Grunberg, from my experience, ever</p> <p>16 had any case where he handled himself for a</p> <p>17 client where he got anything close to</p> <p>18 millions of dollars, but I wanted to ask</p> <p>19 him about that.</p> <p>20 And then on his website, he says in</p> <p>21 the False Claims Act arena, Jonathan has</p> <p>22 extensive experience involving Medicare</p> <p>23 fraud, including representing</p> <p>24 whistleblowers in a record-setting case</p> <p>25 that settled for \$450 million. I wanted to</p>                     |
| <b>Page 11</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Page 13</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>1 Mr. Grunberg if he would admit that the</p> <p>2 other two partners in that firm, Katherine</p> <p>3 Hernacki and Stacey Evans, would not hire</p> <p>4 him to go to work for their new firms. I</p> <p>5 wanted to ask him if he acknowledged that I</p> <p>6 gave him a job and I kept him on at full</p> <p>7 salary so he would have a job as an</p> <p>8 associate with L. Lin Wood, PC, a firm that</p> <p>9 I have always maintained as an ongoing</p> <p>10 professional corporation in Georgia since</p> <p>11 it was founded in September of 1997.</p> <p>12 So I know Jonathan Grunberg's legal</p> <p>13 practice from roughly 2011 through at least</p> <p>14 a portion of 2020. I wanted to ask him</p> <p>15 about the crisis manager role because I --</p> <p>16 I've never seen him do that. Jonathan</p> <p>17 said -- and this disturbed me, so I really</p> <p>18 wanted to question him about this.</p> <p>19 Jonathan said that his work includes -- and</p> <p>20 I quote here -- "Precedent-setting</p> <p>21 litigation against CNN that freed</p> <p>22 plaintiffs from the risk of paying</p> <p>23 defendant's attorney's fees."</p> <p>24 Well, Jonathan did help me on a case</p> <p>25 for David Carbone in which my theory</p> | <p>1 ask Jonathan if that's the DaVita case that</p> <p>2 I handled in front of Judge Pannell here in</p> <p>3 Atlanta, Georgia, where I traveled all over</p> <p>4 the country taking depositions and worked</p> <p>5 on that case for four years and expended</p> <p>6 hundreds of thousands of dollars in</p> <p>7 expenses. Jonathan had very little work on</p> <p>8 that case.</p> <p>9 Stacey Evans was my partner. When she</p> <p>10 and I dissolved in 2014, she stayed on as</p> <p>11 an independent contractor, Stacey Evans,</p> <p>12 LLC, and continued to work with me, and I</p> <p>13 reached an agreement with her to pay her a</p> <p>14 fair fee for what her efforts were.</p> <p>15 Jonathan did very little, but I -- but</p> <p>16 I gave Jonathan a \$200,000 bonus from that</p> <p>17 case so that he could pay off his student</p> <p>18 loans. I wanted to ask Jonathan about</p> <p>19 that. I was going to ask him about what he</p> <p>20 did in the case because he didn't do very</p> <p>21 much. But then again, I don't know what</p> <p>22 he's going to tell me. He might have lied</p> <p>23 under oath, but he's not here to answer the</p> <p>24 questions.</p> <p>25 There are other parts of the website</p> |

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1 of Wade, Grunberg & Wilson regarding the  
2 firm itself and the partners in that firm  
3 where they take on representing to the  
4 public success in a variety of states.  
5 You'd read their website and think, whoa,  
6 those people have been all over the United  
7 States handling cases. Every one of the  
8 states that they represent in their website  
9 refers to cases that I handled for my  
10 clients where, in some instances, I allowed  
11 them to help me.

12 So I wanted to ask Jonathan Grunberg  
13 if he thought it was appropriate in a  
14 lawyer's website under the Georgia Rules of  
15 Professional Conduct to misrepresent his  
16 experience. I don't believe it is. I  
17 believe it's a violation, an ethical  
18 violation.

19 I noted that my name and my law firm's  
20 name doesn't appear on the website of Wade,  
21 Grunberg & Wilson. I know in this lawsuit,  
22 they are claiming that they were my law  
23 partners. I dispute that agreement. But  
24 they sure don't identify themselves as  
25 having formerly been my law partners in

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1 their website. I guess they didn't want to  
2 lie on their website. I don't know. I  
3 wanted to ask him about that, but he chose  
4 not to show up in violation of his lawful  
5 duty to be here.

6 I wanted to ask Jonathan Grunberg  
7 about the professional rules of conduct in  
8 Georgia that require that a lawyer obtain  
9 the consent of a client if there's going to  
10 be a fee division with an outside law firm.

11 For example, here, in this matter, I  
12 had agreed under circumstances which  
13 ultimately, if given the opportunity, I  
14 will explain to the Court, I believe that  
15 amount to extortion. I had agreed to pay  
16 Jonathan and his two law partners in Wood  
17 Grunberg & Wade -- let me not make that  
18 mistake -- Wade, Grunberg & Wilson -- I  
19 never was a law partner of Nicole Wade --  
20 and Wade, Grunberg & Wilson, LLC, I wanted  
21 to resolve the dispute where they were  
22 trying to extort money from me they didn't  
23 have. But I, at the time, had efforts  
24 underway to try to have Richard Jewell, a  
25 client that I love, to try to have

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1 President Trump award posthumously to  
2 Richard the Presidential Medal of Freedom.  
3 I also was heavily involved in representing  
4 [REDACTED], and these lawyers  
5 started making outrageous claims about my  
6 mental health. Ol' Jonathan told me I need  
7 to be on lithium. I said, Jonathan, when  
8 did you get your medical degree?

9 They were using my children, who had  
10 some concerns about my conduct, and I  
11 understood those concerns because I  
12 surrendered my life to Jesus Christ and God  
13 in 2018 and my life changed. They fostered  
14 in my children conduct which I felt  
15 strongly violated one of God's Commandments  
16 to honor thy father. I was not happy with  
17 Jonathan Grunberg, Nicole Wade or Taylor  
18 Wilson for that involvement with my  
19 children. I wanted to ask him about that  
20 today in detail.

21 But I wanted to ask him about Rule 1.5  
22 where the Bar requires that I get  
23 Nicholas's consent to a lawsuit that I  
24 settled for him with CNN and a second  
25 lawsuit I settled with him -- for him with

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1 the Washington Post, his consent to giving  
2 these lawyers their unfortunately -- it's  
3 the truth -- extortion they tried to  
4 successfully, now unsuccessfully obtain  
5 from me.

6 When I resolved the matter with CNN  
7 and the Washington Post, Todd McMurtry, a  
8 lawyer who had retained me to represent,  
9 along with him, [REDACTED],  
10 presented to [REDACTED] the  
11 agreement that I had entered into with  
12 Wade, Grunberg & Wilson, and told the  
13 client that I recommended he agree to it.

14 [REDACTED] asked Mr. McMurtry  
15 what the law was. The law is, just as it  
16 is in Georgia, the same in Kentucky, has to  
17 be a reasonable relationship between the  
18 fee and the services rendered. So  
19 [REDACTED] asked for Grunberg and Wade  
20 and Wilson to provide him with their  
21 timesheets so that he could evaluate the  
22 work they did on the case. They refused to  
23 give it to the boy. That's a violation, I  
24 believe, of the Georgia Professional Rules  
25 of Ethics.

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1 I wanted to ask Jonathan about that  
2 today. I wanted to ask him, Why didn't you  
3 give [REDACTED] your timesheets? I  
4 wanted to ask Jonathan today how much time  
5 he put into the files of the CNN case and  
6 the Washington Post. Because I believe if  
7 he testified truthfully, his time on those  
8 cases was very, very little. But he didn't  
9 show up today. I guess he didn't want to  
10 admit that truth.

11 Instead of giving [REDACTED] the  
12 timesheets, his own client file material,  
13 which you're required to give to the  
14 client, Mr. Grunberg and his two partners  
15 at Wade, Wilson and Grunberg drafted up a  
16 lawsuit and said, We're going to sue you  
17 for breach of contract. I thought, Well,  
18 what in the heck did I do wrong?

19 I was willing to live up to the  
20 agreement even though it was extortion. I  
21 told the client that I recommended he agree  
22 to the fee division. The client exercised  
23 his lawful right not to do so without  
24 seeing the timesheets they refused to give  
25 him, and they turn around and said they're

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1 going to sue me for breach of contract.  
2 Are you kidding me? I wanted to ask  
3 Jonathan about that today because I don't  
4 believe Jonathan Grunberg, if he tells the  
5 truth, is going to be able to avoid the  
6 truth. I didn't breach the contract. He  
7 did.

8 I wanted to ask him if he was aware of  
9 the Georgia law that has an implied  
10 covenant of good faith and fair dealings,  
11 and whether he agreed that he violated that  
12 when he refused to give [REDACTED] the  
13 timesheets. I wanted to ask him about that  
14 today.

15 But then when they said they were  
16 going to sue me for breach of contract,  
17 they also said they were going to sue me  
18 for fraud, fraud in the inducement. And  
19 they sent me a draft of a complaint that  
20 had -- a 79-page complaint that had a  
21 good -- I don't even know -- 40, 50 pages  
22 of salacious, out-of-context, false and  
23 misrepresentative statements about me.

24 But in the agreement that I reached  
25 with Mr. Grunberg and his cronies, Wade and

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1 Wilson, they had released all their claims  
2 against me. So even if there was a fraud  
3 claim -- which there's not -- it had been  
4 released. So Grunberg was going to try to  
5 enforce the agreement to get paid, but he  
6 was going to break the agreement by suing  
7 me in violation of the release and covenant  
8 not to sue.

9 I wanted to ask him if he was aware of  
10 the fact that under Georgia law that was a  
11 repudiation of the contract, so that his  
12 contract is now void. I wanted to ask him  
13 about that today, but he didn't show up.

14 I also wanted to ask him about some of  
15 the specifics in that complaint. Because  
16 they told me if I didn't agree to pay them  
17 \$1.5 million, 1.25 in cash, and to pay for  
18 their share of the office lease -- which  
19 the building had told them they owed  
20 three-fourths of -- we had an  
21 office-sharing arrangement -- that if I  
22 didn't pay \$1.5 million to him immediately,  
23 he was going to sue that case and, you  
24 know, in essence, listen, do exactly what  
25 he did, smear my name, have that complaint

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1 circulated all over the country for people  
2 to attack me and to accuse me and to smear  
3 my reputation. That's blackmail. That's  
4 extortion, in my view. I wanted to ask  
5 Jonathan about that today.

6 But some of the stuff in the complaint  
7 didn't make sense. I needed to clarify it  
8 with Jonathan. Like he claimed that I  
9 assaulted him in October of 2019. I know  
10 exactly what happened. I talked about it a  
11 little bit in Taylor Wilson's deposition  
12 yesterday.

13 I was in California. We were taking  
14 depositions in the Elon Musk case where I  
15 represented Vernon Unsworth, a hero who  
16 helped save the children in the Thai cave  
17 rescue. We had a long day of depositions.  
18 Went back to the Beverly Hilton. I had to  
19 prepare for depositions early the next  
20 morning. I couldn't find my briefcase.

21 Well, if you've ever been a lawyer out  
22 of town and you're getting ready to take  
23 depositions and you can't find your  
24 briefcase that's got everything in it, you  
25 tend to panic, and I did. I was looking

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**Pages 22..25**

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| <b>Page 22</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Page 24</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>1 all over the Beverly Hilton trying to find</p> <p>2 out if I left it down in the lobby, if I</p> <p>3 left it outside where we unloaded, and I</p> <p>4 was repeatedly calling Jonathan to see if</p> <p>5 he had picked it up and taken it to his</p> <p>6 room or if he had it with him. He didn't</p> <p>7 answer his phone.</p> <p>8 So after about 45 minutes to an hour</p> <p>9 of frantically searching and making several</p> <p>10 calls to Jonathan asking him to please call</p> <p>11 me back, someone told me they thought they</p> <p>12 saw him and he was downstairs at the</p> <p>13 Beverly Hilton. When I got to -- saw him</p> <p>14 down there, he was sitting there at a table</p> <p>15 with a nice dinner spread out in front of</p> <p>16 him next to a fountain pool of water --</p> <p>17 beautiful scenery -- and his phone was</p> <p>18 turned off.</p> <p>19 As any lawyer -- and I wanted to ask</p> <p>20 him about this. You go out of town with a</p> <p>21 senior partner in a law firm and you're</p> <p>22 basically an associate or an assistant, you</p> <p>23 leave your phone on, especially when you</p> <p>24 know you've got important depositions the</p> <p>25 next day.</p>     | <p>1 Georgia is relying on this lawsuit that he</p> <p>2 filed against me to try to discipline me</p> <p>3 and disbar me against -- based on</p> <p>4 allegations that are false that, at best,</p> <p>5 with respect to an assault, there's two</p> <p>6 sides to it. Only two people on the</p> <p>7 elevator. Wonder why the State Bar would</p> <p>8 be inclined to believe Mr. Grunberg and not</p> <p>9 me.</p> <p>10 Maybe that's part of the State Bar's</p> <p>11 political agenda to try to discipline me</p> <p>12 because my politics don't match the</p> <p>13 politics of the grievance committee members</p> <p>14 of the State Bar of Georgia in the</p> <p>15 political witch-hunt that they have</p> <p>16 instituted against me. I wanted to ask</p> <p>17 Jonathan about all that.</p> <p>18 I wanted to also ask him if he talked</p> <p>19 to Chris Steinmetz of the Georgia Bar or</p> <p>20 anybody in the Georgia Bar where they</p> <p>21 interviewed him to find out the truth about</p> <p>22 these allegations in their complaint. I</p> <p>23 wanted to find out when he was interviewed;</p> <p>24 who interviewed him; how long the interview</p> <p>25 lasted; what was said by both participants</p>                                                                      |
| <b>Page 23</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Page 25</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>1 Well, I had some choice words for</p> <p>2 Mr. Grunberg, and I wanted to ask him if he</p> <p>3 remembered what I said to him. I didn't</p> <p>4 threaten him, but I wasn't happy with him.</p> <p>5 So we get on the elevator after I told him</p> <p>6 to get his -- we'll just say rear end up</p> <p>7 and get to my briefcase in his room.</p> <p>8 We get on the elevator, and ol'</p> <p>9 Jonathan bows up his chest, bumps up</p> <p>10 against my chest like he's a bull getting</p> <p>11 ready to go to war, and I shoved him</p> <p>12 against the elevator wall and I said, You</p> <p>13 do that again -- I drew my fist back and I</p> <p>14 said, If you do that again, I will whip</p> <p>15 your ass.</p> <p>16 Now, if anybody assaulted anybody,</p> <p>17 Jonathan assaulted me, but I didn't -- I</p> <p>18 didn't go out and start yelling assault.</p> <p>19 Jonathan was just showing his A-S-S, and so</p> <p>20 it was what it was.</p> <p>21 Never heard another word about it from</p> <p>22 the boy until I -- all of a sudden, to try</p> <p>23 to extort me, he puts in a claim that I</p> <p>24 assaulted him. I wanted to ask him about</p> <p>25 that in detail because the State Bar of</p> | <p>1 in the interview. A lot of questions about</p> <p>2 that on a very important issue because this</p> <p>3 lawsuit filed by Jonathan Grunberg has now</p> <p>4 become totally intertwined as the basis for</p> <p>5 the State Bar's disciplinary action against</p> <p>6 me. Never in my career, now 44 years, have</p> <p>7 I seen a State Bar go after a lawyer based</p> <p>8 on unproven and disputed allegations in a</p> <p>9 civil lawsuit. It's unheard of. I wanted</p> <p>10 to ask Jonathan what the State Bar told him</p> <p>11 about that; why they were doing that in</p> <p>12 this instance to me.</p> <p>13 I wanted to talk to Jonathan Grunberg</p> <p>14 about that incident. I wanted to also talk</p> <p>15 to him about what he knew about the</p> <p>16 allegation of Taylor Wilson where he now</p> <p>17 claims that I assaulted him when he burst</p> <p>18 into my home unannounced after I had had a</p> <p>19 very difficult conversation with my</p> <p>20 daughter, and I pushed his chest and said,</p> <p>21 What are you doing here? I wanted to ask</p> <p>22 Jonathan what he knew about that because,</p> <p>23 again, that's two people in a situation</p> <p>24 where I don't know what Taylor is going to</p> <p>25 say about it because he didn't show up</p> |



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| <b>Page 26</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Page 28</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>1 either. I don't know how Jonathan knows</p> <p>2 anything about it, but nothing was ever</p> <p>3 said about it after the event until they</p> <p>4 put it into this lawsuit where they tried</p> <p>5 to extort me to have me pay them</p> <p>6 \$1.5 million in a case that even they claim</p> <p>7 is only worth \$647,000, after they get the</p> <p>8 benefit of \$280,000 that I was to pay for</p> <p>9 their share of the lease. They owe me</p> <p>10 \$280,000. I wanted to ask Jonathan when he</p> <p>11 was going to pay me, but he didn't come</p> <p>12 today.</p> <p>13 Jonathan always would jab me when I</p> <p>14 would say he was from Chile. He would say,</p> <p>15 No, I'm from Chile. We used to have a joke</p> <p>16 in the office -- because Jonathan is</p> <p>17 Jewish -- and I would sometimes look at him</p> <p>18 and say, Jonathan, you're just a Chilean</p> <p>19 Jew. He'd laugh. Taylor would laugh.</p> <p>20 Nicole would laugh. And then he files this</p> <p>21 lawsuit and accuses me of being an</p> <p>22 anti-Semite because I called him a Chilean</p> <p>23 Jew. He took a joke and turned it into a</p> <p>24 heinous accusation of anti-Semitism. I</p> <p>25 wanted to ask him about that in detail</p> | <p>1 involvement with Black Lives Matter. I</p> <p>2 also wanted to ask him about his</p> <p>3 involvement potentially with the communist</p> <p>4 party in this country, but he is not here</p> <p>5 to answer those questions.</p> <p>6 I also wanted to go back and ask</p> <p>7 Jonathan about the time he left work, and</p> <p>8 about 8:00 at night, he went to rock climb</p> <p>9 and -- at a facility in Atlanta, and he</p> <p>10 fell because his rope broke when they went</p> <p>11 to let him down. He fell 40 feet, landed</p> <p>12 on his feet, crushed his feet. His life</p> <p>13 was threatened, his extremities were</p> <p>14 threatened, but he received excellent care</p> <p>15 at Grady Hospital. And after one year of</p> <p>16 treatment and recovery, he was able to come</p> <p>17 back to work.</p> <p>18 I wanted Jonathan to acknowledge that</p> <p>19 during that one year, I did something I</p> <p>20 don't believe many employers would do, I</p> <p>21 paid him his full salary as an associate</p> <p>22 and supported his family and his recovery</p> <p>23 in any way possible. I wanted to ask</p> <p>24 Jonathan if he forgot about that.</p> <p>25 Apparently he did. I also wanted to ask</p>                                       |
| <b>Page 27</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Page 29</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>1 today, but he didn't show up.</p> <p>2 I wanted to ask Jonathan about his</p> <p>3 expressed hatred for President Donald J.</p> <p>4 Trump. We used to have a lot of political</p> <p>5 discussions in the office. They didn't</p> <p>6 last too long because Jonathan would</p> <p>7 usually storm out because he couldn't -- he</p> <p>8 didn't like my position. He knew that I</p> <p>9 was a loyal and avid supporter of President</p> <p>10 Trump and his efforts to make America great</p> <p>11 again.</p> <p>12 Some of our political discussions, I</p> <p>13 used to look over and say to Jonathan, Good</p> <p>14 gracious, Jonathan, you're so far left, I</p> <p>15 think you're a communist. I wanted to ask</p> <p>16 him if he is a member of the Communist</p> <p>17 Party of the United States of America</p> <p>18 because based on what I've seen in 2020</p> <p>19 with Jonathan Grunberg, I wanted to ask him</p> <p>20 that question.</p> <p>21 I know I have seen Twitter posts that</p> <p>22 he has retweeted support for Black Lives</p> <p>23 Matter, BLM. I did not know that when he</p> <p>24 worked for me that he was a supporter of</p> <p>25 BLM. I wanted to ask him about his</p>                                       | <p>1 him if he forgot about the \$200,000 bonus I</p> <p>2 gave him to help him pay off his student</p> <p>3 loans. I wanted to find out if he forgot</p> <p>4 about that, but he's not here to tell me.</p> <p>5 Jonathan was around me when I was</p> <p>6 representing whistleblower Elin Kunz in a</p> <p>7 matter against Halifax which I, working</p> <p>8 with other lawyers -- not Jonathan, but</p> <p>9 lawyers outside of my firm, we resolved for</p> <p>10 \$92 million, the largest settlement of a</p> <p>11 Stark -- that's capital S-T-A-R-K -- Stark</p> <p>12 case, Medicare fraud case in the history of</p> <p>13 the country.</p> <p>14 Also, I would have -- I would have</p> <p>15 asked him at length about what I did for</p> <p>16 two great men, Alon Vainer, a medical</p> <p>17 doctor, and Daniel Barbir, a medical nurse,</p> <p>18 who were whistleblowers in a case against</p> <p>19 DaVita, the second largest owner and</p> <p>20 operator of dialysis clinics in a case of</p> <p>21 Medicare fraud where they were wasting</p> <p>22 medicines that I resolved for \$450 million</p> <p>23 plus fees they had to pay for a total of</p> <p>24 \$492 million, which was a record in the</p> <p>25 United States in a False Claims Act case</p> |

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| <b>Page 30</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Page 32</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>1 for recovery where the United States</p> <p>2 government refused to intervene. We</p> <p>3 handled it on our own. Jonathan played</p> <p>4 very little role in that. But I wanted to</p> <p>5 ask him about those two cases because I</p> <p>6 wanted to have Jonathan acknowledge that I</p> <p>7 had great credibility in ascertaining the</p> <p>8 credibility of whistleblowers.</p> <p>9 Because there's been a lot of</p> <p>10 accusations made, and the State Bar is</p> <p>11 relying on some of them about comments that</p> <p>12 I made publicly based on a whistleblower's</p> <p>13 statements to me about Vice -- former Vice</p> <p>14 President Mike Pence, Chief Justice John</p> <p>15 Roberts and former Deputy Attorney General</p> <p>16 Rod Rosenstein. I didn't make accusations.</p> <p>17 I published accusations made by a person I</p> <p>18 believe was a credible whistleblower. I</p> <p>19 wanted to ask Jonathan about his knowledge</p> <p>20 of my abilities to evaluate the credibility</p> <p>21 of witnesses, including whistleblowers.</p> <p>22 I also wanted to ask Jonathan about</p> <p>23 whether he's had any conversations with</p> <p>24 Rick Miller of Bryan Cave. Ol' Rick Miller</p> <p>25 and his wife, Cherie Fuzzell, who is a</p>         | <p>1 by Rick Miller with Jonathan, Nicole or</p> <p>2 Taylor, to potentially hack into my firm</p> <p>3 computer system to get documents related to</p> <p>4 the payment to Cherie Fuzzell.</p> <p>5 I wanted to ask him if he was aware</p> <p>6 and would acknowledge that I ascertained</p> <p>7 that my computer system in February of 2020</p> <p>8 had been hacked, my e-mails had been</p> <p>9 hacked, the Wi-Fi at my house and my lake</p> <p>10 house had been violated.</p> <p>11 At the time, I had a security person</p> <p>12 named Anthony Armstrong, who had been</p> <p>13 recommended by Rick Miller. I was</p> <p>14 concerned that Rick and Jonathan and even</p> <p>15 Nicole and Taylor might have been involved</p> <p>16 in trying to get Rick information about</p> <p>17 that DaVita case.</p> <p>18 I also wanted to ask Jonathan if he</p> <p>19 knew about what Rick Miller had said to my</p> <p>20 son, raising suspicions in my son's mind</p> <p>21 about a bishop of a church that I had made</p> <p>22 a significant donation to. Rick made my</p> <p>23 son be concerned about it so much so that I</p> <p>24 asked for the money back, and then found</p> <p>25 out later that Rick Miller had known the</p>         |
| <b>Page 31</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Page 33</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>1 lawyer licensed in Georgia but has been an</p> <p>2 executive for several years at Apple. Back</p> <p>3 in February of 2020, I received information</p> <p>4 that raised concerns to me that ol' Rick</p> <p>5 and Cherie had potentially defrauded me out</p> <p>6 of \$10 million in the DaVita case and</p> <p>7 another case that I had handled for Rick</p> <p>8 for his -- for the sister of his</p> <p>9 administrative assistant at Bryan Cave.</p> <p>10 Rick Miller's a longstanding partner</p> <p>11 at Bryan Cave, used to be my best friend,</p> <p>12 especially when I was making him</p> <p>13 \$10 million in the DaVita case, then I had</p> <p>14 some concerns that perhaps that had not</p> <p>15 been done correctly when I found out that</p> <p>16 Bryan Cave actually had and was</p> <p>17 representing DaVita at a time when Rick</p> <p>18 Miller's wife was receiving \$10 million</p> <p>19 under an agreement where she was going to</p> <p>20 help finance expenses, and she put in about</p> <p>21 600,000 and got \$10 million, I began to be</p> <p>22 concerned that that was not a legal,</p> <p>23 ethical arrangement, and I wanted to know</p> <p>24 what Jonathan knew about Rick Miller and</p> <p>25 whether he had -- was aware of any efforts</p> | <p>1 bishop for years. He knew he was</p> <p>2 legitimate. All of which culminated at the</p> <p>3 time in my filing a complaint with the FBI</p> <p>4 because I thought these people had gotten</p> <p>5 together to defraud me, including computer</p> <p>6 fraud, but I later dismissed it.</p> <p>7 I wanted to ask Jonathan all about</p> <p>8 that because he put that in his lawsuit.</p> <p>9 What that had to do with fraud in a</p> <p>10 settlement agreement, alleged fraud, I had</p> <p>11 no idea. I wanted to ask Jonathan about</p> <p>12 that, but he's not here to answer those</p> <p>13 questions.</p> <p>14 I wanted to ask Jonathan about all of</p> <p>15 his conversations with Steve Wynn, a former</p> <p>16 client of mine who I have subsequently</p> <p>17 learned since the time he fired me under</p> <p>18 suspicious circumstances the day I was</p> <p>19 supposed to have dinner with President</p> <p>20 Trump at Mar-a-Lago back in March 2020. I</p> <p>21 wanted to find out if he had been talking</p> <p>22 to Steve Wynn because I've learned that</p> <p>23 Steve Wynn has almost been a lifelong</p> <p>24 informant for the government with respect</p> <p>25 to matters related to gaming, et cetera. I</p> |



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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: right;"><b>Page 34</b></p> <p>1 didn't know what Steve Wynn was up to based<br/> 2 on what I learned about him after the fact.<br/> 3 So I wanted to ask Jonathan if he<br/> 4 talked to Steve Wynn. Whether Steve Wynn,<br/> 5 who defamed me and was probably worried<br/> 6 that I was going to sue him -- whether<br/> 7 Steve Wynn might have been involved in<br/> 8 helping Jonathan and Taylor and Nicole<br/> 9 finance the case. I don't know. I'm not<br/> 10 making that accusation, but I wanted to ask<br/> 11 about whether that was, in fact, the truth.<br/> 12 I wanted to find out if anybody has<br/> 13 been providing any money to Jonathan,<br/> 14 Taylor, and Nicole to pursue this<br/> 15 litigation against me, which seems to be<br/> 16 more litigation designed to smear me than<br/> 17 to collect money on a fee dispute.<br/> 18 Those are legitimate questions. I was<br/> 19 entitled to answers. How much have you<br/> 20 been billed? How much are you owed?<br/> 21 They're suing me for attorney's fees, even<br/> 22 though they don't have a claim under<br/> 23 Georgia law for it, but nonetheless, I have<br/> 24 the right to know all that information.<br/> 25 Jonathan had a duty to come here today and</p> | <p style="text-align: right;"><b>Page 36</b></p> <p>1 credibility as a plaintiff's defamation<br/> 2 lawyer. And also same questions I wanted<br/> 3 to ask him about the Washington Post and<br/> 4 Kevin Baine, a lawyer on the other side<br/> 5 that I believe in large part resolved that<br/> 6 case based on my reputation, experience and<br/> 7 skill as a defamation lawyer. Kevin Baine<br/> 8 represented Tom Brokaw and NBC back when I<br/> 9 settled the case for Richard Jewell against<br/> 10 Tom Brokaw and NBC back in 1996.<br/> 11 I wanted to ask Jonathan about that<br/> 12 since Jonathan seems to be claiming credit<br/> 13 for it on his website and in this lawsuit.<br/> 14 It's utter nonsense. I wanted to ask him<br/> 15 about that.<br/> 16 I wanted to ask Jonathan if he ever<br/> 17 watched the two-hour presentation I gave at<br/> 18 the request of Mercer University in January<br/> 19 of 2020, I believe January the 16th, where<br/> 20 I spoke on professionalism at the request<br/> 21 of Mercer Dean Cathy Cox, what most people<br/> 22 have seen and recognize as one of the best<br/> 23 speeches ever given on professionalism<br/> 24 where I made clear you put your client<br/> 25 first, not your money, not yourself, but</p> |
| <p style="text-align: right;"><b>Page 35</b></p> <p>1 tell me about the answers to those<br/> 2 questions. He violated the law in not<br/> 3 coming. People have to draw their own<br/> 4 conclusions.<br/> 5 I'm very concerned about the<br/> 6 conversations that Jonathan and his other<br/> 7 partners, Taylor Wilson and Nicole Wade,<br/> 8 may have had with my children. Although<br/> 9 Nicole Wade has already admitted in a text<br/> 10 that she gave me that my mental health was<br/> 11 fine, and she knew how upset I was about<br/> 12 the problems with my children because she<br/> 13 knows, as Jonathan and Taylor, how dearly I<br/> 14 love my children, how I've dedicated my<br/> 15 life to my children. I was going to ask<br/> 16 Jonathan about that today. He'd tell you<br/> 17 the truth -- I hope -- about what a<br/> 18 wonderful father I have been, but he's not<br/> 19 here to answer those questions.<br/> 20 I wanted to ask Jonathan about his<br/> 21 knowledge that the CNN case, the major<br/> 22 factor in that case was my longstanding<br/> 23 decade relationship with David Vigilante,<br/> 24 general counsel, in-house counsel for CNN,<br/> 25 who knows my abilities and skills and my</p>                                   | <p style="text-align: right;"><b>Page 37</b></p> <p>1 your client first. I wanted to ask<br/> 2 Jonathan if he watched that, and then ask<br/> 3 him why he apparently did not learn<br/> 4 anything from it.<br/> 5 I wanted to ask him if -- in watching<br/> 6 if he thought there was anything that was<br/> 7 mentally wrong with me in January of 2020<br/> 8 when I gave that two-hour presentation<br/> 9 without notes.<br/> 10 I wanted to ask Jonathan if he was<br/> 11 aware of the fact that Mercer University<br/> 12 asked me to give remarks by video for the<br/> 13 graduation of the Mercer law school class<br/> 14 of 2020 in May of 2020. I wanted to ask<br/> 15 him if he saw my comments which Dean Cathy<br/> 16 Cox said she put at the end after former<br/> 17 Governor Nathan Deal's comments to the<br/> 18 graduates because, as she told me, she said<br/> 19 she wanted to save the best for last. That<br/> 20 was the end of May of 2020.<br/> 21 I wanted to ask Jonathan if he had<br/> 22 seen my remarks and if he thought there was<br/> 23 anything about them that raised any<br/> 24 concerns about my mental health. I wanted<br/> 25 to ask him if he thought there were any</p>                                                           |

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1 concerns about my mental health when I  
 2 negotiated a settlement for [REDACTED]  
 3 [REDACTED] against CNN in January and  
 4 February of 2020, when I negotiated a  
 5 settlement for David Carbone against CNN in  
 6 January and February of 2020, and when I  
 7 negotiated a settlement against the  
 8 Washington Post for [REDACTED] in  
 9 May and June of 2020, because I can't  
 10 understand why the State Bar of Georgia is  
 11 relying on Jonathan's lawsuit to raise the  
 12 slightest question about my mental health.

13 Because during the time period of the  
 14 lawsuit's allegations, all of the objective  
 15 criteria suggested that not only was I  
 16 mentally sound, I was doing a pretty good  
 17 job as a lawyer for my clients and trying  
 18 to help the legal community with my  
 19 speeches and the graduates of Mercer  
 20 University with my comments upon their  
 21 graduation, but Jonathan is not here to  
 22 answer any of those questions.

23 But I can tell you one of the  
 24 questions is answered, and I want Jonathan,  
 25 when the time comes, to admit the truth and

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1 I want him to send it to Chris Steinmetz at  
 2 the Georgia Bar and all of those people on  
 3 that grievance committee, some of whom have  
 4 ties to George Soros. We've looked into  
 5 them.

6 I want him to -- put this right in  
 7 front of him where he said in this  
 8 settlement agreement in Paragraph 6D that  
 9 as a party to that agreement, he  
 10 acknowledged, as did Nicole Wade and Taylor  
 11 Wilson, that I was mentally competent in  
 12 all respects, including my ability to enter  
 13 into the agreement, and in any and all  
 14 prior agreements which form the basis, in  
 15 whole or in part, for certain disputes  
 16 between the parties, agreements that had  
 17 been made months before.

18 Jonathan Grunberg knows as a matter of  
 19 fact that I have been and at all times  
 20 remain mentally competent as a lawyer and  
 21 as a person, and the State Bar's efforts to  
 22 use his litigation against me to the  
 23 contrary is arrant nonsense. It's  
 24 frivolous. I wanted to ask Jonathan  
 25 Grunberg about all that information too.

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1 I have a lot of other questions that I  
 2 want to put to Jonathan Grunberg. I had a  
 3 lot of questions I wanted to put to Taylor  
 4 Wilson. I had a lot of questions I wanted  
 5 to put to Nicole Wade. All of those  
 6 lawyers have seen me take depositions  
 7 before. I play by the rules, but I do not  
 8 tolerate lies. And they know that I have a  
 9 God-given talent to cross-examine a  
 10 witness, and I can expose the lies. Maybe  
 11 that's why they were scared to show up for  
 12 their depositions because they knew that I  
 13 would take a deposition that would reveal  
 14 the truth and show that the frauds in this  
 15 matter are Jonathan Grunberg, Nicole Wade,  
 16 Taylor Wilson, Chris Steinmetz of the  
 17 Georgia Bar, and anybody on that grievance  
 18 committee. They're all frauds trying to  
 19 persecute me for political agenda because I  
 20 fought for President Trump, and I filed  
 21 lawsuits to expose what I still believe,  
 22 and we're beginning to learn more and more  
 23 about, was fraud and illegality in the  
 24 November 2020 election.

25 This is America. This is not

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1 communism, except that's what they're  
 2 doing. It's like living in a communist  
 3 state. When the rule of law is ignored and  
 4 people go out for political agendas and  
 5 they have a witch-hunt against you, I  
 6 wanted to find out whether Jonathan  
 7 Grunberg was on a political witch-hunt  
 8 against me because of his support for BLM  
 9 or his possible involvement in the  
 10 Communist Party of America, but he's not  
 11 here.

12 So I'm going to end my recitation of  
 13 making a record to demonstrate to the Court  
 14 that I had a valid purpose in deposing him,  
 15 that I had and have a multitude of relevant  
 16 questions to ask him, and that I've been  
 17 deprived of the ability to defend myself  
 18 against his false lawsuit by his failure to  
 19 show up, and I've been hampered in my  
 20 ability to prosecute my counterclaim  
 21 against Jonathan Grunberg, Nicole Wade and  
 22 Taylor Wilson, because I've got one. I've  
 23 got one, and I'm going to pursue it.

24 So I'm going to end my remarks at this  
 25 time. If there's anything you believe I've

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| <p>1 left out that I should say, Ibrahim or</p> <p>2 John, please tell me. I reserve --</p> <p>3 obviously I have so many more questions for</p> <p>4 these lawyers, who I don't believe, as I'll</p> <p>5 state on the record, are fit to practice</p> <p>6 law in this state or any state.</p> <p>7 Oh, I did want to ask him one other --</p> <p>8 I wanted to make the record. I wanted to</p> <p>9 ask Jonathan Grunberg and Taylor Wilson why</p> <p>10 in the world were they surreptitiously</p> <p>11 recording me back in February. What was</p> <p>12 that all about? They're in a relationship</p> <p>13 with me, an office-sharing relationship. I</p> <p>14 have them working on a case-by-case basis</p> <p>15 as lawyers to assist me in certain files.</p> <p>16 They have a fiduciary duty. What in the</p> <p>17 world were they doing surreptitiously</p> <p>18 recording me? What was their motive? What</p> <p>19 were they planning? Were they trying to</p> <p>20 set me up? Were they trying to say things</p> <p>21 that would make me look bad while they</p> <p>22 would look good?</p> <p>23 You know, when you start</p> <p>24 surreptitiously recording someone, that</p> <p>25 raises a lot of questions in your mind</p> | <p>1 the Court.</p> <p>2 So we're continued for the day. Thank</p> <p>3 you, Madam Reporter. Thank you my</p> <p>4 wonderful videographer, Mr. Gallo,</p> <p>5 Alexander Gallo.</p> <p>6 B.J., how long have you known me?</p> <p>7 COURT REPORTER: I was going to ask</p> <p>8 you that question.</p> <p>9 MR. WOOD: A long time, isn't it?</p> <p>10 COURT REPORTER: Uh-huh (affirmative).</p> <p>11 MR. WOOD: A good lawyer, aren't I?</p> <p>12 COURT REPORTER: You are.</p> <p>13 MR. WOOD: Thank you.</p> <p>14 Alexander, I knew you when you were a</p> <p>15 little boy.</p> <p>16 I'm proud of both of you. Deposition</p> <p>17 is now suspended. Thank you.</p> <p>18 VIDEOGRAPHER: The time is 10:08.</p> <p>19 We're going off the record.</p> <p>20 (Deposition suspended at 10:08 a.m.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <p>1 about the motive of the person doing the</p> <p>2 recording. They're sure not going to make</p> <p>3 themselves look bad.</p> <p>4 I wanted to ask Jonathan about that</p> <p>5 too because I find that to be unethical. I</p> <p>6 find that to be offensive, especially when</p> <p>7 he's talking about matters of my faith and</p> <p>8 my children. So that would have been</p> <p>9 another area I wanted to go into.</p> <p>10 But I had more, and if given the</p> <p>11 opportunity, as part of my counterclaim</p> <p>12 against them, I'll take Mr. Grunberg's</p> <p>13 deposition. You can run, but you cannot</p> <p>14 hide. And the long arm of justice is</p> <p>15 eventually going to cause that boy to sit</p> <p>16 down and be under oath and be deposed, and</p> <p>17 the truth is going to come out.</p> <p>18 Ibrahim, anything else?</p> <p>19 MR. REYES: We're good, sir.</p> <p>20 MR. WOOD: All right. Well, at this</p> <p>21 point, we'll then conclude this portion of</p> <p>22 the deposition of Jonathan D. Grunberg.</p> <p>23 Obviously, it's continued. We reserve the</p> <p>24 right to complete the examination after we</p> <p>25 have a chance to address these issues with</p>                          | <p>1 DISCLOSURE</p> <p>2</p> <p>3 Pursuant to Article 10.B of the Rules</p> <p>4 and Regulations of the Board of Court</p> <p>5 Reporting of the Judicial Council of</p> <p>6 Georgia which states: "Each court reporter</p> <p>7 shall tender a disclosure form at the time</p> <p>8 of the taking of the deposition stating the</p> <p>9 arrangements made for the reporting</p> <p>10 services of the certified court reporter,</p> <p>11 by the certified court reporter, the court</p> <p>12 reporter's employer or the referral source</p> <p>13 for the deposition, with any party to the</p> <p>14 litigation, counsel to the parties, or</p> <p>15 other entity. Such form shall be attached</p> <p>16 to the deposition transcript," I make the</p> <p>17 following disclosure:</p> <p>18</p> <p>19 I am a Georgia Certified Court</p> <p>20 Reporter. I am here as a representative of</p> <p>21 Huseby Global Litigation. Huseby Global</p> <p>22 Litigation was contacted to provide court</p> <p>23 reporting services for the deposition.</p> <p>24 Huseby Global Litigation will not be taking</p> <p>25 this deposition under any contract that is</p> <p>prohibited by O.C.G.A. 9-11-28(c).</p> <p>Huseby Global Litigation has no</p> <p>contract/agreement to provide reporting</p> <p>services with any party to the case, any</p> <p>counsel in the case, or any reporter or</p> <p>reporting agency from whom a referral might</p> <p>have been made to cover this deposition.</p> <p>Huseby Global Litigation will charge</p> <p>its usual and customary rates to all</p> <p>parties in the case, and a financial</p> <p>discount will not be given to any party to</p> <p>this litigation.</p> <p align="right"><i>Blanche J. Dugas</i></p> <p align="right">Blanche J. Dugas<br/>CCR No. B-2290</p> |

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1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3

4 I hereby certify that the foregoing  
5 transcript was reported, as stated in the  
6 caption, and the questions and answers  
7 thereto were reduced to typewriting under  
8 my direction; that the foregoing pages  
9 represent a true, complete, and correct  
10 transcript of the evidence given upon said  
11 hearing, and I further certify that I am  
12 not of kin or counsel to the parties in the  
13 case; am not in the employ of counsel for  
14 any of said parties; nor am I in any way  
15 interested in the result of said case.

16

17

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19



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BLANCHE J. DUGAS, CCR-B-2290

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22

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24

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## NICOLE WADE vs L. LIN WOOD, ET AL.

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ANDREW M. BEAL

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Email: ABEAL@BUCKLEYBEAL.COM

August 7, 2020

**VIA ELECTRONIC MAIL ONLY**  
**(chris.marquardt@alston.com)**

Christopher C. Marquardt, Esq.  
Alston & Bird  
1201 West Peachtree Street  
Atlanta, GA 30309

Re: Demand for Payment

Dear Chris:

Yes, thank you, we are all doing well, and we hope you are as well.

As you know, the settlement agreement between your clients L. Lin Wood, Esq. and L. Lin Wood, P.C. and my clients dated March 17, 2020 ("Agreement") required payment by your clients of the amounts set forth in the Agreement within 72 hours of your clients' receipt of payment. In your letter of July 24<sup>th</sup>, you have stated that it is your client's intention to withhold payment of the primary fee because [REDACTED] has allegedly declined to consent to the agreed-upon fee sharing. If this is your position, it is meritless, and your client has engaged in fraud.

First, Rule 1.5(e) of the Georgia Rules of Professional Conduct specifically governs only "lawyers who are not in the same firm," and specifies that "Paragraph (e) does not prohibit or regulate division of fees to be received in the future for work done when lawyers were previously associated in a law firm." *See* Rule 1.5, cmt. 8. Moreover, the Georgia Bar has made clear through a formal advisory opinion that client consent is not required when sharing fees with attorneys from the same firm who are working under the supervision of the firm. In other words, Rule 1.5 is irrelevant here.

In light of the clear inapplicability of Rule 1.5(e), it appears that your client is simply declining to make payment in bad faith and in keeping with his repeated statements that he would never pay my clients "one thin dime" and would destroy their careers. These statements of his intent, coupled with his physical assaults and threats of harm, form the hallmarks of malicious intent. Your client's own conduct shows that this rule is inapplicable as he routinely requested that my clients work on cases with him, under his supervision, and share in fees with him without any

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Christopher Marquardt, Esq.  
August 7, 2020  
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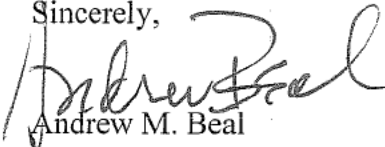
special authority from clients. Your client did so because he knew that no other consent or authority was required.

In fact, it is plain that your clients never intended to perform under the Agreement as evidenced by the fact that you were able to write and send to me this detailed letter on Nicholas' 18<sup>th</sup> birthday. Regardless, the Agreement specifically states that at all times [REDACTED] were the clients of L. Lin Wood and L. Lin Wood, P.C. As such, even if settled law were turned on its head and client consent were relevant here, your clients would have had a duty to obtain the consent of all of their clients prior to entering into this agreement. In fact, Mr. McMurtry, also the [REDACTED] counsel, made just such a representation. For your clients to enter into an agreement, deliberately misrepresenting their actual authority to enter into the agreement, constitutes fraud in the inducement, allowing my clients to rescind the contract and to sue in fraud and for all the damages they incurred as a result of your client's tortious behavior during their work with your clients.

It is clear that your clients' recent position has no legal basis and reflects a fraudulent scheme. Please have your client wire the funds as required by the Agreement, which are now severely past due. My clients' offer to accept the amounts set forth in the Agreement shall remain open through noon EST on Monday, August 10<sup>th</sup>.

Finally, my clients are still receiving notices from the courts as counsel of record in the Sandmann matters, despite my numerous requests to file the Notices of Withdrawal which I sent to your clients in March. Per Mr. Wood's requests, my clients did not contact the [REDACTED] or file into the [REDACTED] cases. Please have those withdrawals filed immediately and have Mr. Wood or Mr. McMurtry confirm that my clients are no longer counsel for the [REDACTED].

Sincerely,



Andrew M. Beal

cc: clients (via email)



**Subject:** FW: WGW  
**Date:** Tuesday, August 25, 2020 at 5:17:00 PM Eastern Daylight Time  
**From:** Andrew Beal  
**To:** Marquardt, Chris  
**CC:** Andrew Beal  
**Attachments:** 20.08.25 Verified Complaint.pdf, 20.08.25 Plaintiffs First Requests for Admissions to Defendant LLW.pdf, 20.08.25 P's First RPDs to D.pdf, 20.0825 P's First Rogs to D.pdf

Chris

Attached please find my clients' verified complaint and initial discovery (which will be served with the complaint but not filed with the court for confidentiality reasons). We also have subpoenas for Nick Sandmann and Todd McMurtry, which are being finalized now, and we will get these to you shortly.

We wanted to share these with you prior to filing. These documents are sent to you with your agreement that your client will not attempt to file a complaint against my clients during the time in which you are reviewing these documents and until you have spoken with me and affirmatively notified me of your client's change of position on this issue. Accordingly, my client will hold off on filing suit for now, until I hear back from you. We would like to mail down a process for engaging in settlement discussions or filing suit in this matter this week. The parties are all well aware of the issues and the law here, and any delay does not really serve either of us. For this reason, unless we hear from you sooner, my clients will not file the above complaint before 5:00 pm EST on Thursday, August 27<sup>th</sup>. Hopefully, we will have an agreement to resolve this by then.

If any of this is incorrect, please let me know. I look forward to working with you on this.

**ANDREW M. BEAL | BUCKLEY BEAL, LLP**

**Direct:** 404-688-2685 | **Fax:** 404-688-2988 | **Email:** [abeal@buckleybeal.com](mailto:abeal@buckleybeal.com)

Bank of America Plaza, Suite 3900 | 600 Peachtree Street, N.E. | Atlanta, Georgia 30308



**Subject:** Settlement Demand

**Date:** Wednesday, August 26, 2020 at 9:09:00 PM Eastern Daylight Time

**From:** Andrew Beal

**To:** Marquardt, Chris, Burby, Joey

Chris and Joey

As we discussed this afternoon, the parties are engaging in settlement discussions by exchanging written offers of terms. This offer will remain open until 5:00 pm Eastern tomorrow, Thursday August 27.

Here is our proposal. Your client pays my clients \$1,250,000.00 immediately in satisfaction of the existing claims my clients intend to file and which you have reviewed, to buy them out of the existing settlement agreement, attorneys fees for this matter, and claims for defamation and breach of non-disparagement based upon today's events. Further, your client will withdraw from the [REDACTED], and [REDACTED] cases and the [REDACTED] matters (for [REDACTED] he will assign all fees to my clients) provided each client consents and will issue a retraction for his libel and slander in the form below to all persons he contacted today. My clients will remit no fees to your client, and your client will have no further responsibilities to make any payments to my clients. Your client will acknowledge responsibility for the Lease and the parties will execute mutual releases. Nothing further is required.

Retraction: "I wanted to take this opportunity to contact you and personally retract the statements I made about my former partners: Nicole Wade, Jonathan Grunberg and Taylor Wilson. I was angry, and those statements are not true."

Drew

**ANDREW M. BEAL**

Buckley Beal, LLP  
Bank of America Plaza, Suite 3900  
600 Peachtree Street  
Atlanta, GA 30308  
(404) 688-2685

**Subject:** RE: Settlement Demand

**Date:** Thursday, August 27, 2020 at 3:47:00 PM Eastern Daylight Time

**From:** Andrew Beal

**To:** Burby, Joey, Marquardt, Chris

Joey

Your request seems reasonable. We will extend the deadline until Monday at noon (I am booked in the afternoon, and you probably would not be able to get in touch with me anyway). This extension is based on the same understanding we are traveling under that the parties will refrain from filing suit while we are discussing settlement (at noon on Monday).

If you cannot agree with any of this, please let me know. We have sent you a demand for retraction by separate email.

Thanks.

Drew.

**ANDREW M. BEAL | BUCKLEY BEAL, LLP**

**Direct:** 404-688-2685 | **Fax:** 404-688-2988 | **Email:** [abeal@buckleybeal.com](mailto:abeal@buckleybeal.com)

Bank of America Plaza, Suite 3900 | 600 Peachtree Street, N.E. | Atlanta, Georgia 30308

**From:** Burby, Joey [<mailto:Joey.Burby@alston.com>]

**Sent:** Thursday, August 27, 2020 12:52 PM

**To:** Andrew Beal; Marquardt, Chris

**Subject:** RE: Settlement Demand

Drew,

During yesterday's call, we proposed mediation (on a fast track) or at least a meeting where the parties would sit down and have an adult conversation about this dispute and how to resolve it, and you indicated you would share that proposal with your clients. We assume based on your email below that the proposal is rejected, but can you please confirm that?

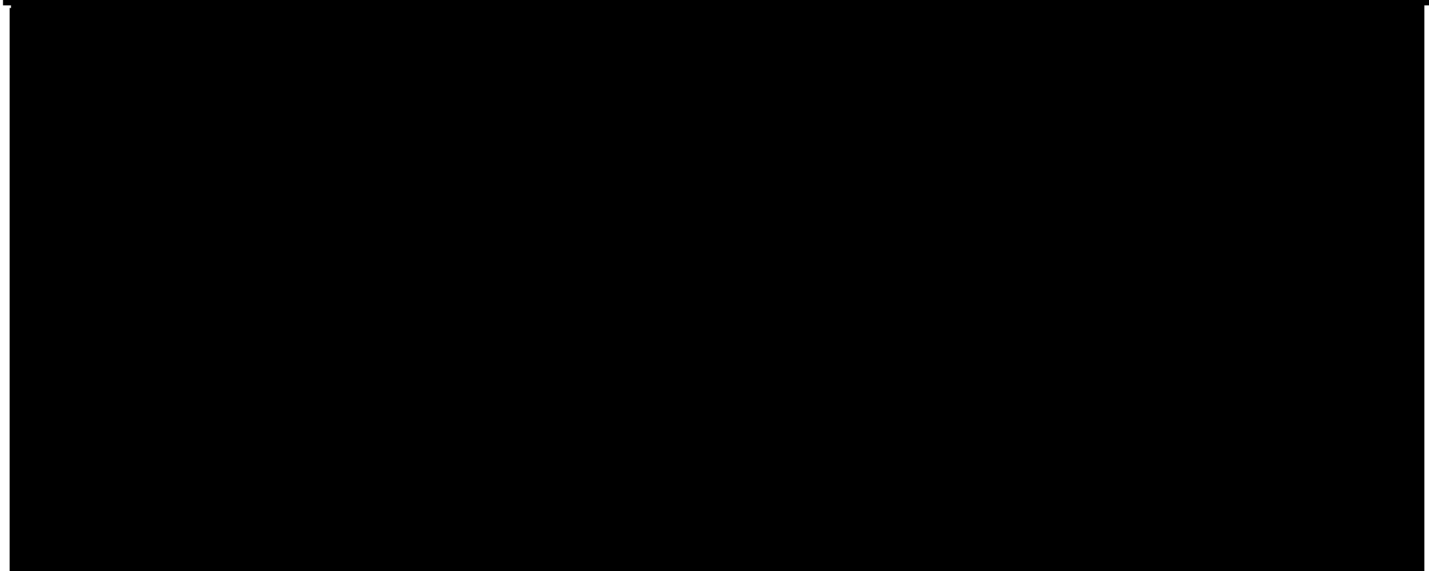
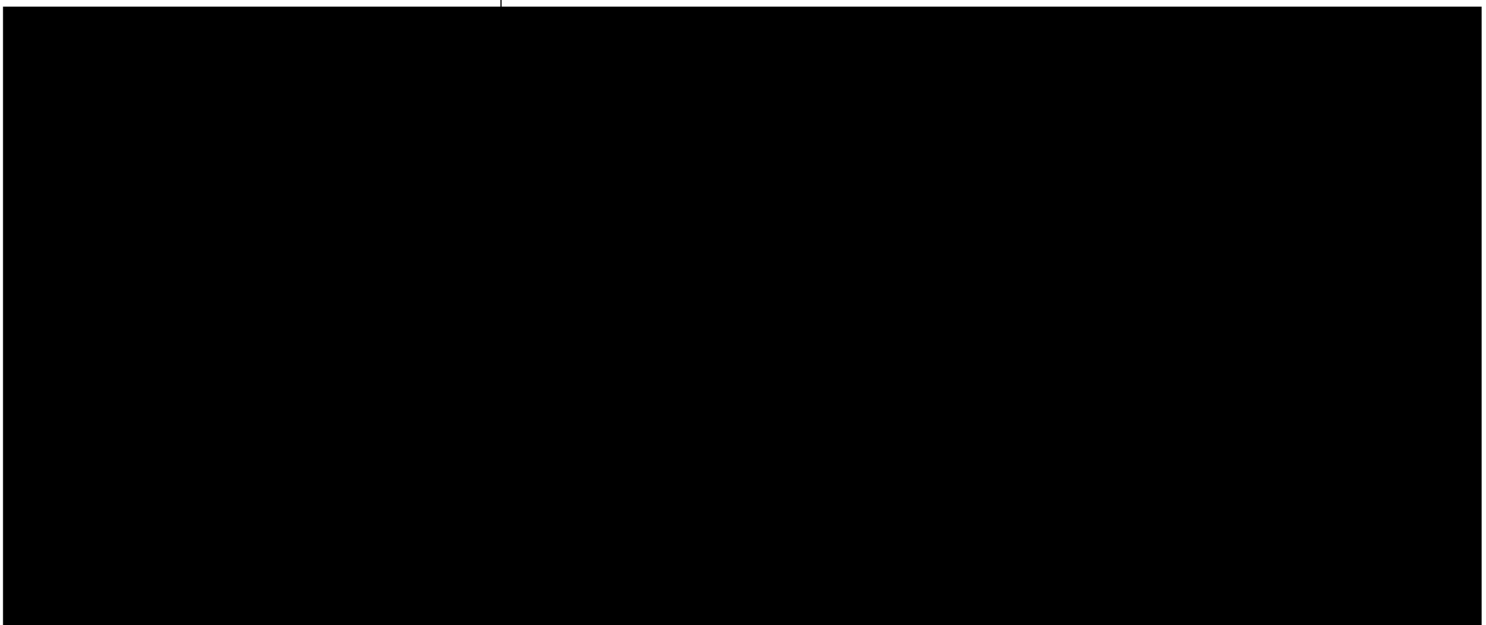
Assuming that's the case, we will certainly discuss your demand with our client and respond in good faith. We need more time to do that, though. The demand is for nearly twice what Lin would have paid your clients under the Settlement Agreement, and you offer no explanation of how you arrived at it. Chris and I both have other commitments today and tomorrow, and Lin is traveling and handling other litigation matters. We'd like to have until Monday to respond so that we have an opportunity to fully discuss this with Lin, and he has time to seriously consider it. In the interim, Lin would agree not to communicate further with any joint clients or otherwise make any statements to third parties about your clients.

There's no reason to impose an artificial deadline given where we are in this process, and sending us a demand after 9pm last night and insisting on a response by 5pm today is simply not reasonable or productive. You sat on our letter, informing you of the consent issue, for 2 weeks, and didn't respond to our August 10 letter for another 2 weeks. Once a lawsuit is filed, any chance of settlement goes away.

Please let us know if your clients will agree to extend the deadline to Monday at 5pm. If you want to discuss this, feel free to call me or Chris.

Joey

R. Joseph Burby  
**ALSTON & BIRD LLP**  
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Christopher C. Marquardt

Direct Dial: 404-881-7827

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August 31, 2020

### ***VIA EMAIL***

Andrew M. Beal, Esq.  
Buckley Beal LLP  
600 Peachtree Street NE, Suite 3900  
Atlanta, GA 30308  
[ABeal@buckleybeal.com](mailto:ABeal@buckleybeal.com)

Re: Rule 408 Settlement Communication

Dear Drew:

I write in response to your clients' recent \$1.25 million settlement demand. We have spent considerable time discussing the threatened lawsuit and demanded settlement amount with our client. Because the demand is unreasonable, Lin rejects it.

During one of the phone conversations that you and I had last week about the complaint that your clients have threatened to file, you opined that no one in the public will care about it because, in your words, "it's just a fee dispute between lawyers." Lin agrees that this is a just fee dispute, despite your clients' efforts to transform it into something different.

Lin has been practicing law for more than 40 years. He loves the law. He loves our profession. He believes that public disputes over fees and Rules of Professional Conduct impugn the profession in the eyes of the public. He further believes that, when disagreements over fees arise, lawyers owe it to themselves, their clients, and our profession to sit down and attempt to work the issues out in good faith. This is a situation where Lin believes that he had a professional obligation to obtain client consent for the fee-split contemplated by the parties' settlement agreement, and he endeavored to get that consent from the client. Accusations of fraud and wrongdoing are wholly misplaced.

Lin has offered to have an in-person settlement meeting with your clients, and he stands by that offer. Thus far they have not accepted it. Lin has also offered to mediate this dispute with your clients, and he stands by that offer. Thus far they have not accepted it. And after discussing the dispute with us in more detail this weekend, Lin instructed us to

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Andrew M. Beal, Esq.

Page 2

make another offer: binding arbitration regarding the Rule 1.5 fee split issue. That would obviously allow a neutral party to determine which side is correct about the application of ethics Rule 1.5 and the fee-split provision in the settlement agreement. Any one of these options would, in our view, be an appropriate method for lawyers who have handled cases together to resolve a fee dispute.

Please talk to your clients about our offer to submit the fee dispute to binding arbitration, if they are not interested in a sit-down meeting or a mediation. We reiterate our request to see WGW's billing records for purposes of these settlement discussions. As I have noted several times, the client has formally requested them, and those records could make this a moot issue. Your recent email expressly acknowledged that we would be requesting them through discovery in the event that your clients carry through with their threat to sue Lin. Providing them now when we are trying to settle the case should not, therefore, be an issue. In an email you sent on Friday night, you asserted for the first time that your clients do not have access to certain information they would need for the purpose of providing billing records. That is news to us. Joey and I are certainly open to discussing that issue with you if you can provide some details.

When you first reached out last week about this threatened lawsuit – as a professional courtesy, you told me – you offered to share a draft complaint for Lin's review and consideration if Lin would agree not to file a lawsuit without me telling you first. We have lived up to that agreement. Later in the week, you asked me to instruct Lin not to engage in further communications with his clients regarding WGW pending these settlement talks, and Lin has lived up to that agreement. If we agree to mediate or arbitrate this dispute, we will instruct Lin to continue abiding by those agreements. We have every expectation that he will follow those instructions.

Lin has supported your clients and their practices for many years. That support continued after this dispute arose. When the [REDACTED] settlement was delayed, Lin offered to provide an unsecured Line of Credit to your clients in the amount of \$500,000 to assist them. He has also referred numerous cases to them over the past few months. Those are not the acts of one with alleged malice for your clients; to the contrary, those and other actions show that Lin cares for them and hopes that they succeed. Lin will work in good faith to resolve this dispute in any one of the ways we have proposed: a meeting, a mediation, or binding arbitration. The communications with his clients that you complained about last week only occurred in response to your clients' explicit threat to make patently false accusations of fraud against Lin in a public filing. If those false allegations are filed, Lin will have no choice but to defend himself and to have further privileged communications with his clients to counter the false narrative from WGW. Because that scenario is not in the interest of our respective clients, or their own clients, we hope that WGW will be open to one of the settlement options I have set forth in this letter.

As always, please feel free to give me a call if you have any questions. I look forward to hearing from you. We believe the parties should get together to work this all out.

Andrew M. Beal, Esq.

Page 3

Sincerely yours,

*/s/ Christopher C. Marquardt*

Christopher C. Marquardt

cc: R. Joseph Burby